



SACHI A. HAMAI
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
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April 12, 2016

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

16 April 12, 2016

LORI GLASGOW
EXECUTIVE OFFICER

Dear Supervisors:

**REQUEST FOR DELEGATED AUTHORITY TO THE CHIEF EXECUTIVE OFFICER
TO NEGOTIATE AND EXECUTE SITE ACCESS AGREEMENTS WITH
LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY
(FOURTH AND FIFTH DISTRICTS)
(3 VOTES)**

SUBJECT

The recommendation is a request to consider the Final Environmental Impact Report (EIR) and make related environmental findings and to delegate authority to the Chief Executive Officer, or her designee, to execute in substantially similar form, Site Access Agreements with the Los Angeles Regional Interoperable Communications System (LA-RICS) Authority for the collocation, construction, operation and maintenance of the Land Mobile Radio (LMR) System at the Los Angeles County Puente Hills (PHN) and Verdugo Peak (VPK) sites.

IT IS RECOMMENDED THAT THE BOARD:

1. Acting as a responsible agency for the Los Angeles Regional Interoperable Communications System (LA-RICS) Authority Land Mobile Radio (LMR) System, consider the Final Environmental Impact Report (EIR) prepared and certified by LA-RICS Authority prior to the Board of Supervisors consideration of the actions recommended herein; certify that the Board of Supervisors has independently considered and reached its own conclusions regarding the environmental effects of the LA-RICS Authority LMR System at County sites as shown in the Final EIR; adopt the Mitigation Monitoring Program as applicable to the County sites proposed for approval, find that the Mitigation Monitoring Program is adequately designed to ensure compliance with the mitigation measures during project implementation; find that there are no feasible alternatives or feasible mitigation measures within the Board of Supervisors power that would substantially lessen or avoid any significant effect the project would have on the environment; and determine that the significant

adverse effects of the project have either been reduced to an acceptable level or are outweighed by the specific considerations of the project, as outlined in the Environmental Findings of Fact and Statement of Overriding Considerations, which findings and statement are adopted as applicable and incorporated herein by reference;

2. Find that the impacts of the two Site Access Agreements are within the scope of the impacts analyzed in the EIR certified by the LA-RICS Authority on March 29, 2016. There have been no changes to the project at these sites since the Final EIR was certified by the lead agency that would require a new environmental review.

3. Delegate authority to the Chief Executive Officer, or her designee, to execute, in substantially similar form, up to two Site Access Agreements for the collocation, construction, operation, and maintenance of the LMR equipment at County-owned sites.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of the recommended action is to consider the Final Environmental Impact Report (EIR) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) System, adopt the environmental Findings of Fact and Statement of Overriding Consideration and Mitigation Monitoring Plan, as applicable, and allow the Chief Executive Officer (CEO) to execute gratis, non-exclusive Site Access Agreements (SAAs) for the Puente Hills and Verdugo Peak sites, to either permit the LMR equipment to be collocated at existing telecommunications infrastructure for the LA-RICS, Long Term Evolution (LTE) System, or to permit the erection of a new up to 180 foot lattice tower with a new 24' x 24' shelter and generator, for an unlimited period at existing County-owned sites. Collocation work at the existing infrastructure will occur at the Puente Hills site. The Verdugo Peak site, which is an existing telecommunications site with other existing towers, will receive up to a 180 foot lattice tower. The Final EIR and corresponding documents is enclosed as Attachment A.

Expeditious and efficient processing of each SAA is needed to allow the LA-RICS Authority to fulfill its grant funding timeline obligations under Urban Areas Security Initiative (UASI) '11, '12, and '13 for completion of various LMR sites, in a phased manner. The subject County-owned sites are outlined in Attachment B. Public outreach to residents within 500 feet of the sites have been completed at the Puente Hills site. There are no residents/businesses within 500 feet of the Verdugo Peak site.

Implementation of Strategic Plan Goals

The proposed Agreements support the Countywide Strategic Plan Goal of Operational Effectiveness (Goal 1). Upon entering into the proposed SAAs, the LA-RICS Authority will be in a position to further develop a modern public safety LMR communication system that will maximize the effectiveness of processes, structure, and operations to support the timely delivery of customer-oriented and efficient public services, particularly in the areas of public safety.

FISCAL IMPACT/FINANCING

The granting of non-exclusive access to LA-RICS Authority will be on a gratis basis, and will have no fiscal impact for the County-owned sites.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

LA-RICS was formed in 2009, as a Joint Powers Authority (JPA) comprised of independent cities, the County, and other public agencies throughout Los Angeles County. The County is a member agency in the LA-RICS Authority. The mission of the LA-RICS Authority is engaged in a region-wide cooperative effort to plan and establish a wide-area interoperable public safety communications network known as LA-RICS. When commissioned, the LA-RICS will provide first and secondary responders with the technology to coordinate, in real time, their response in day-to-day operations, and most importantly, during emergencies. The LA-RICS is made up of two independent systems, the LTE and the LMR Systems. The SAAs proposed in this action are only for the LMR System.

These SAAs are necessary to license certain real property owned by the County to the LA-RICS Authority for use as a LMR communications site. The LA-RICS Authority will collocate, construct, own, operate, and maintain the LMR System. The LMR project is a single, unified public safety radio communications system for Los Angeles County. Currently, more than 80 public safety agencies use 40 different and aging radio systems to communicate, preventing them from talking in real-time during catastrophic events. LA-RICS will provide public safety agencies with better, faster, and more accurate information with which to save lives and protect property.

Federal funding has been provided to support LA-RICS' mission, and certain milestones must be fulfilled in connection with this funding. The use of these two sites will facilitate applying these federal funds timely.

The proposed SAAs have been prepared and negotiated by the Chief Executive Office-Real Estate Division (CEO-RED), LA-RICS Authority, and various County Counsel representing each party. Each SAA will be executed in a form substantially similar to Attachment C. The SAAs stipulate that LA-RICS' responsibilities include utility payments, maintenance obligations, as well as certain insurance and indemnity requirements.

The LA-RICS Authority Outreach Team, consisting of specialists with experience in telecommunications, engineering, site acquisition, public safety personnel, and staff experienced with working with elected officials, scheduled and coordinated meetings with the impacted jurisdictions. In regards to the two sites identified in this Board letter, outreach has been completed for Puente Hills, including door-to-door outreach to residents/businesses within 500 feet of the proposed sites. As previously mentioned, there are no residents/businesses within 500 feet of the Verdugo Peak site. The LA-RICS Authority also met with the Rowland Heights Coordinating Council in regards to the Puente Hills site. Once the construction schedule has been approved, and prior to construction, those same residents will receive construction notifications via a door hanger/flyer, one to two weeks prior to the start of construction.

ENVIRONMENTAL DOCUMENTATION

On March 29, 2016, the LA-RICS JPA Board of Directors certified the Final EIR for the LA-RICS LMR System. In approving the two SAA Agreements, the County is acting as a responsible agency for the LA-RICS LMR Project. The LA-RICS Authority, as lead agency under CEQA, has prepared an Initial Study, consulted with the County and certified the Final EIR on March 29, 2016. Since the EIR has been certified as recommended, the approval by the County will determine that the EIR is adequate, and will adopt the Findings of Fact, Statement of Overriding Consideration and Mitigation Monitoring Plan prepared for the LA-RICS LMR Project, as applicable to Sites PHN and VPK.

The proposed Site Access Agreements allow for the LA-RICS Authority to conduct work related to the design, construction, implementation, operation and maintenance of LMR infrastructure at the two sites in Attachment B, owned or leased by the County of Los Angeles. All of these sites are within the scope of the previously-authorized project and were analyzed in the Final EIR.

There have been no changes to the project since the LA-RICS Authority Board certified the EIR or to the circumstances under which the project is undertaken that would result in new effects or the need for new mitigation. Thus, the EIR can be used as the basis for the LA-RICS Authority's approval of the SAAs and no new environmental document is required pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. Upon the Board's approval of the SAAs, the CEO's Office will file a Notice of Determination with the Registrar-Recorder/County Clerk (RR/CC) in accordance with Section 21152(a) of the California Public Resources Code and pay the required filing and processing fees with RR/CC in the amount of \$75.

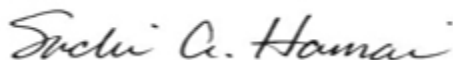
IMPACT ON CURRENT SERVICES (OR PROJECTS)

The approval of these Board recommendations will not compromise public safety missions or disrupt any vital, existing County communication systems.

CONCLUSION

It is requested that the Executive Office, Board of Supervisors, return two certified copies of the Minute Order to the CEO, Real Estate Division at 222 South Hill Street, 4th Floor, Los Angeles, CA 90012.

Respectfully submitted,



SACHI A. HAMAI
Chief Executive Officer

SAH:DPH:CMM
KW:AA:ls

Enclosures

- c: Executive Office, Board of Supervisors
- County Counsel
- Internal Services
- Sheriff

ATTACHMENT A

Final Environmental Impact Report

**FINAL
ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM**



Prepared for:

LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

MARCH 2016

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1.0 Introduction

1.1 Project Descriptions and Location

The Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (Authority) proposes to establish a Land Mobile Radio (LMR) system as a communications system for first responders in Los Angeles County. The LMR system would consist of installation, operation, and maintenance of LMR facilities at up to 90 sites. The Authority is considering a total of 95 sites to provide alternate locations if some sites are determined to be unviable and are removed from further consideration during site feasibility assessments, system engineering, geotechnical evaluations, the permitting process, and/or in lease agreement discussions with the property owner. Of these 94 sites, the Authority has previously determined that 40 sites are statutorily exempt from California Environmental Quality Act (CEQA) under Public Resources Code section 21080.25. A Draft Environmental Impact Report (EIR) was prepared to analyze the remaining 54 sites that did not qualify for the CEQA statutory exemption. Although potential LMR sites are located in Los Angeles County and adjacent portions of Orange and San Bernardino counties, the sites evaluated in the Draft EIR (i.e., the sites not subject to statutory CEQA exemption) are all located within Los Angeles County with the exception of one site in San Bernardino County. Each of the 54 sites analyzed in the Draft EIR would be equipped with whip and microwave antennas mounted on either (a) an existing building, or on an existing or modified monopole or lattice tower, or (b) a new monopole or new lattice tower. Supporting infrastructure to be developed at each site would include equipment racks to be located inside a new or existing equipment shelter or building, a new up to 85-kilowatt backup generator with up to 1,500-gallon integrated diesel fuel tank, and supporting interconnections for fiber and electrical service.

A more detailed description of the project and the alternatives considered is provided in Chapter 2.0 of the Draft EIR.

1.2 Public Review Process for the Draft EIR

The Authority published a Notice of Availability (NOA) for the Draft EIR on January 11, 2016, initiating a 45-day public review and comment period that ended on February 25, 2016. The NOA was published on the LA-RICS website (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>). The availability of the Draft EIR and the dates of public meetings were advertised in the following newspapers:

- *Antelope Valley Press*
- *La Opinión*
- *Los Angeles Wave*
- *Long Beach Press-Telegram*
- *Los Angeles Daily News*
- *Los Angeles Times*

- *Santa Clarita Valley Signal*
- *San Gabriel Valley Tribune*

Public meetings were hosted on the following dates and locations:

Monday, January 25, 2016, 6:30 p.m.

Walnut Senior Center, Assembly Room
21215 La Puente Road, Walnut, CA 91789

Tuesday, January 26, 2016, 6:30 p.m.

Canoga Park Branch Library, Meeting Room
20939 Sherman Way, Canoga Park, CA 91303

Wednesday, January 27, 2016, 6:30 p.m.

Culver City Veterans Memorial Building, Multipurpose Room
4117 Overland Ave., Culver City, CA 90230

Thursday, January 28, 2016, 6:30 p.m.

Jane Reynolds Activity Center, Activity Room
716 Oldfield St., Lancaster, CA 93534

Tuesday, February 2, 2016, 6:30 p.m.

Peck Park Community Center, Auditorium
560 N. Western Ave., San Pedro, CA 90732

Tuesday, February 16, 2016, 4:00 p.m.

Catalina Country Club, Dining Room
1 Country Club Drive, Avalon, CA 90704

The format for each public meeting was the same. The meeting started with introductions of team members present at the meeting. A short presentation provided an overview of LA-RICS, the proposed LMR system, the CEQA process and the contents of the Draft EIR, and methods for providing comments on the Draft EIR. The meeting concluded with an open house where the public could talk one-on-one with project team members to ask questions or gain a better understanding of the project and the locations of proposed LMR sites. Although the meeting format allowed for conversation with the project team, the presentation directed that only written comments to the Draft EIR would be considered. Comment forms were provided at the public meetings. Completed comment forms could be submitted during the meeting or mailed to the Authority.

The Draft EIR was available for review at the following locations and on the LA-RICS website at <http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-January-2016.pdf>.

Acton Agua Dulce Library
33792 Crown Valley Road
Acton, CA 93510

Angelo M. Iacoboni Library
4990 Clark Ave.
Lakewood, CA 90712

Azusa City Library
729 N. Dalton Ave.
Azusa, CA 91702

Avalon Public Library
215 Sumner Ave.
Avalon, CA 90704

Canoga Park Branch Library
20939 Sherman Way,
Canoga Park, CA 91303

Castaic Library
27971 Sloan Canyon Road
Castaic, CA 91384

James S. Thalman Chino Hills Branch Library
14020 City Center Drive
Chino Hills, CA 91709

Lancaster Library
601 W. Lancaster Blvd.
Lancaster, CA 93534

Los Angeles Public Library Central Library,
Science, Technology & Patents Department
630 W. Fifth St.
Los Angeles, CA 90071

Los Angeles Regional Interoperable
Communications System Headquarters Building
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

Malibu Library
23519 Civic Center Way
Malibu, CA 90265

Pasadena Public Library
285 E. Walnut St.
Pasadena, CA 91101

Peninsula Center Library
701 Silver Spur Road
Rolling Hills Estates, CA 90274

West Hollywood Library
625 N. San Vicente Blvd.
West Hollywood, CA 90069

Westlake Village Library
31220 Oak Crest Drive
Westlake Village, CA 91361

Wrightwood Public Library
6011 Pine St.
Wrightwood, CA 92397

In accordance with CEQA Guidelines §15088, the Authority, as Lead Agency for the Proposed Project, has reviewed and evaluated written comments submitted during the public review period regarding the LMR Project.

The CEQA Guidelines, §15088, "Evaluation of Response to Comments," states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

- c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
- d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
 - 1) Revise the text in the body of the EIR, or
 - 2) Include marginal notes showing that the information is revised in the response to comments.

No significant changes to the data and analysis contained in the Draft EIR have been required as a result of the comments received during this response process. The responses provided herein clarify, amplify, elaborate, and make minor modifications to the Draft EIR. The Draft EIR remains adequate and complete; therefore, recirculation per CEQA §15088.5 is not required. This Final EIR will be presented to the Authority for certification.

In Chapter 4 of this Final EIR, the Authority has elected, as appropriate, to revise the Draft EIR text where necessary to address errata or update the EIR with information gained in the Responses to Comments document.

CEQA Guidelines §15088 addresses a Lead Agency's responsibilities in responding to comments. The Guidelines require, among other things, that the Lead Agency provide a good faith, reasoned analysis in response to significant environmental issues raised, particularly when the Lead Agency's position is at variance with the objections and recommendations raised by commenters. §15088 does not require an individual response to each comment letter and does not prevent the Authority from responding to comments by way of a summary or comprehensive response that may apply to several individual remarks in comment letters.

Public Resources Code §21091(d)(1) requires that the Authority, as Lead Agency, consider any comments on the proposed Draft EIR that are received within the public review period. As previously discussed, six public meetings were held; however, no public comments were submitted at these meetings; and no additional environmental issues were raised at the meetings that had not been addressed in the Draft EIR. The Authority received 74 comment letters and/or emails on the Draft EIR from public agencies, organizations, and individuals during the public review period.

CEQA Guidelines §15204(a) provides that:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and need not provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines § 15204(c) further advises:

Reviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to §15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines § 15204(d) states:

Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.

CEQA Guidelines § 15024(e) states:

This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or the lead agency to reject comments not focused as recommended by this section.

Each comment received on the Draft EIR is included in its entirety in this document. Each letter or email containing comments on the Draft EIR is followed by responses corresponding to comments submitted in the letter or email. Comments have been arranged herein under the following categories: State Agency Comments, Local/Regional Jurisdiction Comments, Non-Governmental Organization Comments, and Public Comments. No new significant environmental impacts are raised by the submitted comment letters.

1.3 Organization of This Document

This Final EIR briefly summarizes the public review and notification process for the Draft EIR, which are key steps in the CEQA process. Chapter 2.0 of this document identifies the persons and agencies who offered comments on the Draft EIR and how those comments are listed and addressed in Chapter 3.0.

Chapter 4.0 provides the revisions to the Draft EIR that have been made for the Final EIR in response to these comments. This includes corrections or additions identified by Authority staff.

The Draft EIR is incorporated by reference into this Final EIR. Chapter 4.0 includes revisions to the Draft EIR in tracked changes (underline/strikethrough) format.

2.0 Agencies and Persons Commenting on the Draft EIR

During the 45-day review and comment period, 71 written comment submissions were received from state, regional, and local agencies; non-governmental organizations; and the public. The submissions varied, some consisting of a single comment while some included more than one individual comment. Responses to comments received are provided in Chapter 3.0. Comment responses are organized in the order listed below.

2.1 State Agency Comments

One letter was received from a state agency (SA). This letter is referenced in Table 2.1-1.

Table 2.1-1: State Agency Comment Letters

Letter	Commenter	Date	Pages
SA-1	Santa Monica Mountains Conservancy	February 25, 2016	12 – 17

2.2 Local/Regional Agency Comments

Thirteen letters were received from agencies with local or regional (LR) jurisdiction. These letters are referenced in Table 2.2-1.

Table 2.2-1: Local/Regional Agency Comment Letters

Letter	Commenter	Date	Pages
LR-1	Antelope Valley Air Quality Management District	January 21, 2016	18 – 20
LR-2	City of Agoura Hills	February 24, 2016	21 – 37
LR-3	City of Beverly Hills	February 25, 2014	38 – 46
LR-4	City of Chino Hills	February 25, 2016	47 – 49
LR-5	City of El Segundo	February 23, 2016	50 – 52
LR-6	City of Glendora	February 19, 2016	53 – 57
LR-7	City of Industry	January 26, 2016	58 – 60
LR-8	City of Rancho Palos Verdes	February 24, 2016	61 – 65
LR-9	City of Rolling Hills	February 12, 2016	66 – 68
LR-10	City of Rolling Hills Estates	January 13, 2016	69 – 71
LR-11	City of Signal Hill	February 25, 2016	72 – 86
LR-12	South Coast Air Quality Management District	February 19, 2016	87 – 89

2.3 Non-governmental Organization Comments

Three comment letters were received from non-governmental organizations (NGOs). These letters are referenced in Table 2.3-1.

Table 2.3-1: Non-governmental Organization Comment Letters

Letter	Commenter	Date	Pages
NGO-1	Brentwood Hills Homeowners Association	February 20, 2016	90 - 101
NGO-2	Federation of Hillside and Canyon Associations, Inc.	February 25, 2016	102 - 108
NGO-3	Catalina Island Conservancy	February 25, 2016	109 - 145

2.4 Public Comments

Fifty-five comment letters were received from the public. These letters are referenced in Table 2.4-1.

Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-1	Armendariz, Alex and Bayer, Daniel	February 19, 2016	146
Public-2	Armstead, Willie B.	February 19, 2016	151
Public-3	Brainard, S. C.	February 19, 2016	152
Public-4	Caldin, Ralph	February 19, 2016	153
Public-5	Clements, Corey	February 19, 2016	154
Public-6	Chen, Woody	February 19, 2016	155
Public-7	Collins, Joseph Jr.	February 19, 2016	156
Public-8	Cree, Janet	February 19, 2016	157
Public-9	Dew, Leslie	February 19, 2016	158
Public-10	Ferrell, Claire and Walter H.	February 19, 2016	159
Public-11	Ferrera-Garcia, Jason	February 19, 2016	160
Public-12	Hebish, Nady	February 19, 2016	161
Public-13	Heeb, Patrick	February 19, 2016	162
Public-14	Jones, Reid	February 19, 2016	163
Public-15	Joy, Ikonija S.	February 19, 2016	164
Public-16	Kent, Diane	February 19, 2016	165
Public-17	Kent, Jonathan	February 19, 2016	166
Public-18	Khem, S.	February 19, 2016	167
Public-19	Lamee, S.	February 19, 2016	168
Public-20	Llamas, S.	February 19, 2016	169
Public-21	Lauer, Grant	February 19, 2016	170
Public-22	Lim, Tony	February 19, 2016	171
Public-23	Loomis, M. and Michelle	February 19, 2016	172
Public-24	Lu, Jun	February 19, 2016	173
Public-25	McCutchen, Quinn and Quintan, Jane	February 19, 2016	174

Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-26	Olweny, Catherine	February 19, 2016	175
Public-27	Rosenthal, Melissa	February 19, 2016	176
Public-28	Shahid, J.	February 19, 2016	177
Public-29	Simmons, Linda	February 19, 2016	178
Public-30	Simmons, Sanford	February 12, 2016	179
Public-31	Steese, Martha A.	February 19, 2016	180
Public-32	Torreblanca, Jose and Kiva	February 19, 2016	181
Public-33	Virga, Bonnie	February 19, 2016	182
Public-34	Warot, Albert and Warot, J.	February 19, 2016	183
Public-35	Name Illegible 2489 Eastwind Way, Signal Hill, CA 90755	February 19, 2016	184
Public-36	Name Illegible 2499 Eastwind Way, Signal Hill, CA 90755	February 19, 2016	185
Public-37	Name Illegible 2501 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	186
Public-38	Name Illegible 2511 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	187
Public-39	Name Illegible 2521 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	188
Public-40	Name Illegible 2530 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	189
Public-41	Name Illegible 2541 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	190
Public-42	Name Illegible 2580 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	191
Public-43	Name Illegible 2591 Hillcrest Street, Signal Hill, CA 90755	February 19, 2016	192
Public-44	Name Illegible 2013 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	193
Public-45	Name Illegible 2304 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	194
Public-46	Name Illegible 2313 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	195
Public-47	Name Illegible 2336 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	196
Public-48	Name Illegible 2377 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	197
Public-49	Name Illegible 2377 Promontory Drive, Signal Hill, CA 90755	February 19, 2016	198
Public-50	Name Illegible 2341 Stanley Avenue, Signal Hill, CA 90755	February 19, 2016	199
Public-51	Name Illegible 2229 Westwind Way, Signal Hill, CA 90755	February 19, 2016	200



Table 2.4-1: Public Comment Letters

Letter	Commenter	Date	Page
Public-52	Name Illegible 2240 Westwind Way, Signal Hill, CA 90755	February 19, 2016	201
Public-53	Fernando, Shan	February 23, 2016	202
Public-54	Simmons, Matthew.	February 12, 2016	203
Public-55	Yedidsion, E.	February 25, 2016	207



3.0 Written Comments and the Draft EIR and Responses to Comments



Comment Letter SA-1



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Paul Edelman, Deputy Director
Natural Resources and Planning
Santa Monica Mountains Conservancy
5750 Ramirez Canyon Road
Malibu, California 90265

Dear Mr. Edelman:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the Santa Monica Mountains Conservancy on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy


Attachment



Comment Letter SA-1

STATE OF CALIFORNIA • THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., Governor

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
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February 25, 2016

Ms. Nancy Yang
Los Angeles Regional Interoperable Communications System
Joint Power Authority
2525 Corporate Place, Suite 100
Monterey Park, California 91754

**LA-RICS, Land Mobile Radio Project
Draft Environmental Impact Report SCH #2014081025**

Dear Ms. Yang:

1 | The Santa Monica Mountains Conservancy (Conservancy) offers comments and recommendations on the Draft Environmental Impact Report (DEIR) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio Project (LMR). The Conservancy is the principal State planning agency for the Santa Monica Mountains. The subject DEIR does not adequately analyze project alternatives which would reduce or eliminate the significant adverse impacts of the proposed project to public visual resources on public lands. The DEIR is deficient under the California Environmental Quality Act (CEQA) for these omissions.

2 | The DEIR fails to adequately analyze the “Environmentally Superior Alternative” with respect to each specific tower location in the Santa Monica Mountains. The Environmentally Superior Alternative section only lists alternative sites for some of the LMR sites being analyzed. The Environmental Impact Report (EIR) will remain deficient until its analysis of the Environmentally Superior Alternative includes a thorough examination of a range of feasible alternatives for each proposed tower location within the Santa Monica Mountains. This discussion of feasible alternatives must provide decision makers with a clear picture of how adverse impacts to public viewshed could be reduced by use of alternative tower heights or antenna configurations at all visually sensitive locations. It should also include an analysis of how the LA-RICS project as a whole would be affected if an individual tower is not constructed at such visually sensitive locations. This includes locations within the viewsheds of public parklands and public trails, on significant ridgelines, and near scenic highways and corridors.

3 |

4 | The proposed Green Mountain (GRM) tower on Temescal Canyon Fire Road is of particular concern due to its unprecedented high visibility from State parkland and public trails. The Site Summary Impact Analysis of this tower location (page 4-569)

Comment Letter SA-1

Ms. Nancy Yang
LA-RICS, Land Mobile Radio Project
Draft Environmental Impact Report SCH #2014081025
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Page 2

4 | erroneously concludes that the proposed LRM tower would not result in significant visual impacts due to the existing facility at the subject site. However, the existing structures at the proposed GRM site are significantly shorter than the proposed 180-foot lattice tower. As proposed, construction of the GRM tower would result in unmitigable significant adverse impacts to public visual resources. The DEIR is deficient for failing to address these impacts, and for failing to identify feasible alternatives for this project site.

Please send further correspondence regarding this project to me at the above letterhead address, or contact me by phone at 310-589-3200, ext. 128, or by e-mail at edelman@smmc.ca.gov. Thank you for your time and consideration.

Sincerely,



PAUL EDELMAN
Deputy Director
Natural Resources and Planning

Responses to Comment Letter SA-1

The Authority appreciates the Santa Monica Mountains Conservancy's comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Comment 1: The Subject DEIR does not adequately analyze project alternatives which would reduce or eliminate the significant adverse impacts of the proposed project to public visual resources on public lands. The DEIR is deficient under the California Environmental Quality Act for these omissions.

Response to Comment 1: The Authority explored numerous options for providing LMR coverage to the Santa Monica Mountains area. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. For several sites located in the Santa Monica Mountains area, alternate sites are identified in the Draft EIR. Section 2.3 of the Draft EIR identifies that sites ENT, LACFCP08, and TOP are alternates to each other and sites H-69B and SPN are alternates to each other. Out of the sites in these two groups, only one site would be constructed from each group. For the remaining sites in the Santa Monica Mountains (sites CPK, ENC1, GRM, LACF072, LEPS, PWT, and ZHQ), no other viable alternate sites were identified that could provide coverage for the area.

Comment 2: The DEIR fails to adequately analyze the "Environmentally Superior Alternative" with respect to each specific tower location in the Santa Monica Mountains. The Environmentally Superior Alternative section only lists alternative sites for some of the LMR sites being analyzed. The Environmental Impact Report (EIR) will remain deficient until its analysis of the Environmentally Superior Alternative includes a thorough examination of a range of feasible alternatives for each proposed tower location within the Santa Monica Mountains.

Response to Comment 2: The Authority prepared the Draft EIR in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively. The Authority has analyzed a range of alternatives, taking in to account feasibility and alternative locations consistent with CEQA Guidelines Section 15126.6 (f). As described in Draft EIR Section 2.5, the environmentally superior alternative is the No Project Alternative. Where the environmentally superior alternative is the No Project Alternative, CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative among the other alternatives. As discussed in response to Comment #1, for all but two groups of sites in the Santa Monica Mountains, only the proposed site could provide coverage for the area and meet project objectives. For the two groups of sites where alternatives have been identified (sites H-69B and SPN; and sites TOP, ENT, and LACFCP08) Section 2.5 of the EIR identifies the environmentally superior alternative.

Please see response to comment #3 regarding the feasibility of alternatives for each of the proposed tower locations in the Santa Monica Mountains.

Responses to Comment Letter SA-1

Comment 3: This discussion of feasible alternatives must provide decision makers with a clear picture of how adverse impacts to public viewshed could be reduced by use of alternative tower heights or antenna configurations at all visually sensitive locations. It should also include an analysis of how the LA-RICS project as a whole would be affected if an individual tower is not constructed at such visually sensitive locations. This includes locations within the viewsheds of public parklands and public trails, on significant ridgelines, and near scenic highways and corridors.

Response to Comment 3: The EIR provides a thorough evaluation and disclosure of the impacts of the project at each site. Detailed impact analysis for each site is provided in Draft EIR Chapter 4. A detailed analysis of the aesthetic impacts was conducted for sites, including impacts to viewsheds of public parklands, trails, significant ridgelines and scenic highways and corridors. This includes all 12 sites within the Santa Monica Mountains and described in detail in Chapter 4 [CPK (discussed at Draft EIR, Pg. 4-296), ENC1 (Pg. 4-372), ENT (Pg. 4-411), GRM (Pg. 4-566), H-69B (Pg. 4-643), LACF072 (Pg. 4-799), LACFCP08 (Pg. 4-837), LEPS (Pg. 4-989), PWT (Pg. 4-1371), SPN (Pg. 4-1563), TOP (Pg. 4-1720), and ZHQ (Pg. 4-2026)].

For sites that would require new towers or monopoles (see Draft EIR Table 2.1-2), site specific analysis is generally based on maximum heights unless otherwise noted; up to 70 feet with an additional 15-foot lightning rod for monopoles and up to 180 feet with an additional 15-foot lighting rod. Analyzing maximum tower heights provides a conservative analysis that discloses the maximum visual impacts that could result from tower construction. Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some sites would be constructed exactly or nearly exactly as they are described in the Draft EIR, but the elements would be no higher or larger than analyzed. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

In response to the comment that the EIR should analyze how the LA-RICS project as a whole would be affected if an individual tower is not constructed, the project site locations have been proposed based on their ability to meet the project objectives set forth in Draft EIR section 2.2. This is true in each of the geographic locations served by the sites identified in the Draft EIR, including those in the Santa Monica Mountains. Not constructing one or more of the individual towers proposed within the Santa Monica Mountains would result in a failure to meet these objectives. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders
- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications
- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements

Responses to Comment Letter SA-1

- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design.

Comment 4: The proposed Green Mountain (GRM) tower on Temescal Canyon Fire Road is of particular concern due to its unprecedented high visibility from State parkland and public trails. The Site Summary Impact Analysis of this tower location (page 4-569) erroneously concludes that the proposed LRM tower would not result in significant visual impacts due to the existing facility at the subject site. However, the existing structures at the proposed GRM site are significantly shorter than the proposed 180-foot lattice tower. As proposed, construction of the GRM tower would result in unmitigable significant adverse impacts to public visual resources. The DEIR is deficient for failing to address these impacts, and for failing to identify feasible alternatives for this project site.

Response to Comment 4: The site-specific project description and visual impact analysis for Site GRM beginning at page 4-568 of the Draft EIR considered, among other factors, the bulk and scale of the existing built landscape of the site and the site's location within Topanga State Park along the heavily traveled Temescal Ridge Trail Road. At Site GRM the Draft EIR identifies that hikers on the Temescal Ridge Trail would be the most likely affected by construction of site GRM. Due to the isolated nature of this site, it is not readily visible from vantage points other than the trail. Views of nature from the trail are currently intruded upon by existing human-made linear structures, such as power poles and powerlines, as well as intermittent views of the existing structures on the proposed site. Due to the area's rolling topography, views of the existing site are limited and intermittent. The analysis in Chapter 4 describes how the proposed facilities would not perceptibly change the scenic vista due to the presence of existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista. The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. In addition, although the height of the new tower was analyzed at up to 180 feet, the actual height could be less following detailed system design. Based on the methodology in Section 3.1.4, the impact analysis in the Draft EIR shows that construction would result in a less than significant visual impact on aesthetics at Site GRM. No changes have been made to the Draft EIR.



Comment Letter LR-1



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Bret Banks, Executive Director
Antelope Valley Air Quality Management District
43301 Division Street, Suite 206
Lancaster, California 93535-4649

Reference: AV0116/007

Dear Mr. Banks:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the Antelope Valley Air Quality Management District] on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-1



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649
Phone 661.723.8070

Bret Banks, Executive Director
In reply, please refer to AV0116/007

January 21, 2016

Nancy Yang, Project Engineer
LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

RE: Notice of Availability of a Draft Environmental Impact Report for the proposed Land Mobile Radio Project-SCH #2014081025

Ms. Yang:

The Antelope Valley Air Quality Management District (District) has received the Notice of Availability for a Draft Environmental Impact Report for the proposed Land Mobile Radio System.

1 The District requires the proposed project comply with all requirements outlined in District Rule 403, Fugitive Dust. Receipt of a District approved Dust Control Plan is required prior to initiating any ground preparation activities if individual sites are greater than 5 acres. During the construction phase, all disturbed areas should be stabilized so that no visible fugitive dust leaves the property line and does not impact traffic or neighboring residents. Upon completion of the project, all disturbed surface areas must meet the definition of a stabilized surface, as defined in Rule 403.

2 In addition, the proponent will need to obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including, but not limited to Internal Combustion Engines with a manufacturer's maximum continuous rating greater than 50 brake horsepower.

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bbanks@avaqmd.ca.gov.

Sincerely,



Bret Banks
Executive Director

BB/bjl

Responses to Comment Letter LR-1

The Authority appreciates the Antelope Valley Air Quality Management District’s comments on the Draft Environmental Impact Report (EIR) dated January 21, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: The District requires the proposed project comply with all requirements outlined in District Rule 403, Fugitive Dust. Receipt of a District approved Dust Control Plan is required prior to initiating any ground preparation activities if individual sites are greater than 5 acres. During the construction phase, all disturbed areas should be stabilized so that no visible fugitive dust leaves the property line and does not impact traffic or neighboring residents. Upon completion of the project, all disturbed surface areas must meet the definition of a stabilized surface, as defined in Rule 403.

Response to Comment 1: Ground preparation activities would not exceed 5,000 square feet (less than 0.12 acre) at any LMR site; therefore, the requirement for a dust control plan for sites greater than five acres would not apply to the project. However, Best Management Practices consistent with the AVAQMD List of Implementation Measures to Reduce PM pursuant to Health and Safety Code 39614(d) (see Draft EIR Section 3.2.4 Project Impacts) would be implemented as part of the project, and these include measures to limit fugitive dust emissions, such as:

- Apply water to the construction site as needed to comply with Rule 403 of the applicable air quality management district.
- Enclose or water down exposed dirt storage piles.
- Minimize the disturbed area and preserve vegetation to the maximum extent possible.
- Phase construction activities, to the extent possible, to reduce disturbed areas and time of exposure.

Comment 2: In addition, the proponent will need to obtain District permits for any miscellaneous process equipment that may not be exempt under District Rule 219 including but not limited to Internal Combustion Engines with a manufacture’s maximum continuous rating greater than 50 brake horsepower.

Response to Comment 2: A discussion of the Antelope Valley Air Quality Management District Rule 219 permitting requirements will be added to the Final EIR in Section 3.2.2.3 *Local Regulatory Setting*. The Draft EIR assumes that operation of backup generators will comply with District Rule 219. Additional discussion of District Rule 219 to evaluate the significance of project impacts under CEQA is not necessary.



Comment Letter LR-2



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Greg Ramirez, City Manager
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, California 91301-2583

Dear Mr. Ramirez:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Agoura Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-2



"Gateway to the Santa Monica Mountains National Recreation Area"

February 24, 2016

Nancy Yang
Project Engineer
Los Angeles Regional Interoperable Communications System
2535 Corporate Place, Suite 100
Monterey Park, CA 91754

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (SCH #2014081025) FOR THE LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM LAND MOBILE RADIO PROJECT

Dear Ms. Yang:

1 Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) (SCH #2014081025) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project. We understand that the LMR system is a wireless communications system for mobile and portable devices, such as walkie-talkies and two-way radios, and would provide day-to-day voice and narrowband data radio communications coverage for emergency responders. The LMR system would consist of antennas and support equipment at up to 90 sites located mostly in Los Angeles County. However, a total of 94 sites have been considered. Of these, 40 sites were determined to be statutorily exempt from the California Environmental Quality Act (CEQA) under PRC Section 20180.25, and no further CEQA analysis is necessary. The DEIR considers the remaining 54 sites that were not statutorily exempt.

One of the LMR sites being considered in the DEIR is in the City of Agoura Hills. The site, referred to as "AGH," is located at Kimberly Peak, off an unnamed road, near Kimberly Drive in the Morrison Ranch area of the City. The site is zoned, and designated in the City General Plan as, Open Space-Deed Restricted (OS-DR). There are no other sites in Agoura Hills being considered – either in the DEIR or that were found to be statutorily exempt from CEQA.

The DEIR indicates that the proposed improvements at the site include the installation of up to 27 whip antennas (each up to 15 feet long) and up to five (5) microwave antennas (each two (2) to six (6) feet in diameter) on a new 70-foot tall, 6.5-foot diameter monopole, with an additional lightning rod of 15 feet high, for a total 85 foot-tall facility. If tower obstruction lighting is required, it may include red or white LED lamps, either steady or flashing, on the monopole. Either an existing equipment shelter at the site may be used, or a new 600 square-

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Ms. Nancy Yang
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 Page 2

foot shelter, either prefabricated or of concrete masonry unit – CMU, installed on a concrete slab. Exterior security lighting equivalent to one (1) 100-watt bulb would be installed. A diesel emergency generator on a 200-square-foot slab would be constructed and enclosed within a block wall, with a 1,500 gallon belly internal fuel tank integrated into the generator. About 800 feet of chain-link fence up to 12 feet in height is proposed around the facility. The depth of excavation is 36 feet for a drilled caisson for the monopole. In total, an area of 5,000 square feet would be disturbed to install the facilities, with permanent disturbance to a 3,000-square foot area.

We understand that best management practices (BMPs) have been incorporated into the project design to minimize impacts to environmental resources. Examples of BMPs listed in the DEIR include minimizing disturbed areas during construction; watering down the construction site; protecting slopes through erosion control blankets; and using erosion control measures to reduce siltation and runoff, among many others.

Our comments on the DEIR are described below, and are organized by section heading:

Section 2.3 Project Alternatives

2 The DEIR lists seven groups of two or more proposed project sites that would be alternatives to each other. However, the AGH site is not listed here as an alternative or as a site to which there are alternatives being explored. Please discuss why no alternatives to the site are being considered.

3 Given the various environmental impacts of the project at the AGH site, noted below, we recommend that alternatives to the facility at AGH be assessed in the DEIR. These could include reducing the height of the monopole (perhaps with a stronger support at the base); locating the antennas on an existing tower at the same site instead of constructing a new tower; and considering other sites nearby – within and outside of Agoura Hills, that would have less impacts. With regard to using an existing tower, DEIR Section 2.6.1 Collocation indicates that, “At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas.” Please provide information to demonstrate this condition specifically at AGH. This section further states, “Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further.” Please provide information demonstrating that locating the proposed facilities on an existing tower at the same site would not provide the desired coverage in this instance, particularly since the existing tower is located at the same site as AGH, and would be expected to provide the same, if not very similar, coverage. Additionally, while a project alternative considering all proposed LA-RICS facilities as collocations may not be feasible or desired, it seems appropriate to consider at least collocating the proposed facilities at the specific AGH site as a feasible alternative.

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Section 3.1 – Aesthetics

4 We suggest that the AGH site be considered visually sensitive given its location on top of a prominent hill that can be seen from many points in the City, including residential neighborhoods. In particular, the site is situated on a primary ridgeline, the Morrison Highlands, as identified on Figure NR-1 Open Space Resources in the Agoura Hills General Plan 2035 (2010). General Plan Goal NR-2 Visual Resources is for the “preservation of significant visual resources as important quality of life amenities for residents, and as assets for commerce, recreation and tourism.” General Plan Policy NR-2.3 Protect Ridgelines states, “Maintain the community’s primary and secondary ridgelines.” Additionally, the site is designated in the General Plan, and zoned, as Open Space-Deed Restricted (OS-DR). The purpose of the OS-DR zone, in part, is to preserve natural features and open space (Agoura Hills Municipal Code – AHMC Section 9490 et. seq.).

5 While we acknowledge that the AGH site is currently the location of several telecommunications-type facilities, the proposed LMR facility would add substantially more structures and a taller tower than what currently exists on the site, resulting in potentially significant aesthetic impacts from an increase in intensity of development, even though the AGH facilities may not block views. The AGH monopole could reach 85 feet tall, compared to the estimated maximum 60-foot high existing tower at the same location (per the DEIR). The AGH site, with the exception of some existing telecommunications equipment, is situated on a hilltop of the Santa Monica Mountains, in a natural area of the City where there is no hillside development. Single-family residential development is located below the hill, in the flatter portions of the City. The DEIR should analyze the potential impacts to aesthetics from the proposed LMR facilities located in this visually sensitive area. In particular, please consider the following:

1. Show the AGH site as being of high or medium viewer sensitivity on Figure 3.1.1.
2. Revise Table 3.1-1 to include the AGH site under the categories of, “Significant Ridgeline” and “Visual Sensitivity.”
3. Address the AGH site in the discussion of Section 3.1.2.3 Local Regulatory Setting, specifically its location on a primary ridgeline in the General Plan.
4. Analyze the AGH site in Section 3.1.4.1 Project Analysis as a high or medium sensitivity site. Revise the discussion of AGH under Impact “AES-1” (Scenic Vista) beginning on page 3-28, Impact “AES-3” (Visual Character) beginning on page 3-34 and under Impact “AES-4” (Light or Glare) starting on page 3-41, accordingly.

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5. Further, under the discussion of Impact “AES-3” on page 3.41, the reference to AGH being an “urban” area should be corrected. The site is set within a preserved open space area in a natural state, at the top of a primary ridgeline in the Santa Monica Mountains. The area below the hillside may be considered “urban,” but not the hillside itself, even though there are telecommunications facilities presently. The text under the paragraph heading, “Urban Areas” states that these are, “... areas where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area...” Given the minimal lighting at the site presently, and its remote location on the hilltop in the OS-DR zone in the Santa Monica Mountains, where there are no other urban light sources, this analysis should be revised.

7 The project should be considered to cause a potentially significant operational impact on aesthetics from lighting and/or glare from the proposed lighting equivalent to one (1) 100-watt bulb, and possibly FAA required lighting. With regard to the former, the City has policies to shield and direct downward all exterior lighting to prevent light spillover and/or glare (*City Architectural Design Standards & Guidelines*, Section III.G Exterior Lighting). The DEIR should reference and incorporate these requirements as a mitigation measure. We request that LA-RICS consider as minimal lighting as feasible at this site, given the surrounding natural area and visibility from numerous points in the City.

Section 3.3 - Biological Resources

This section identifies vegetation communities in and around the AGH site. The DEIR identifies the site being within a California walnut woodland. The site is also set within an area of coastal sage scrub habitat, which should be addressed in the analysis of impacts to biological resources. Specifically, please consider the following:

1. Table 3.3-1 should include AGH as a site within the “Coastal sage scrub” vegetation community. (Note that this community is listed as being within the area of AGH in Table 3.3-3).
2. Table 3.3-4 should be corrected to list AGH under “California Walnut Woodland,” consistent with the discussion in this section.
3. Within DEIR Section 4.0 Site Summary Forms, the Mitigation Measure under Impact BIO-2 (substantial adverse impact on riparian habitat or other sensitive natural community) reads, “Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut



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trees to protect the plant’s root system.” However, this Mitigation Measure does not appear to be referenced in the Biological Resources section or elsewhere in the DEIR. Please incorporate this mitigation into a formal Mitigation Measure and reference it where appropriate for site AGH.

Section 3.4-1 Cultural Resources

We appreciate that Mitigation Measures CUL 6 and CUL 7 related to protecting paleontological resources have been incorporated into the DEIR for site AGH. Table 3.4-4 lists Mitigation Measure CUL 1 (archaeological monitoring), CUL 3 (unexpected discovery of archaeological remains), and CUL (unexpected discovery of human remains) as applicable to site AGH. Yet, Table ES-2 Environmental Impacts and Mitigation Measures in the Executive Summary does not list these mitigation measures for AGH, and the Summary Form for AH in DEIR Section 4.0 Site Summary Forms does not list these mitigation measures as applicable for AGH. Please correct this discrepancy. While the DEIR notes that no identified archaeological sites have been identified within 0.5 mile of the site, Agoura Hills in general is considered a sensitive archaeological area, and discovery of previously unknown cultural resources is possible. As such, the City typically incorporates mitigation measures in construction projects to have an archaeologist and Native American representative monitor subsurface work, and, in the event human remains are uncovered, follow procedures as outlined in the CEQA Guidelines and required under state and federal law. Please ensure that such protective measures are incorporated into the DEIR for site AGH.

Section 3.9 – Land Use/Planning

Table 3.9-4 states that the height limit in the OS-DR zone, where the facilities are proposed, is 60 feet. The OS-DR standards in the Agoura Hills Municipal Code do not list 60 feet as the maximum allowed height. Please also note that the proposed facility is not listed as an allowed use in the OS-DR zone. Consequently, please correct Section 4.0 Site Summary Forms notes under “Setting” and “Impact Analysis” that the required permit would be a Conditional Use Permit.

Section 3.10 - Noise

In addition to the City’s Zoning Ordinance, the General Plan 2035 (2010), Chapter 5: Community Safety, Noise section, addresses noise in Agoura Hills. Please list the appropriate General Plan standards in DEIR Table 3.10-2 and analyze potential noise impacts from ongoing operation of AGH in light of these standards. Specifically, see Table N-1 (Noise/Land Use Compatibility Matrix) and Table N-2 (Interior/Exterior Noise Standards) of the General Plan. This section of the DEIR estimates the potential operational noise from the facility as 58 dBA at 21 feet away

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15 | for the emergency generator (assuming solid walls around it, as proposed), and 52 dBA at 10 feet away for the HVAC systems. Please confirm that this estimate would be accurate specifically for AGH, considering that the site would be located on a hilltop, with residential uses below.

16 | The DEIR lists the allowed hours of construction noise pursuant to the Municipal Code, which are from 7:00 a.m. to 7:00 p.m. during the weekdays and on Saturdays. We request that these hours be strictly adhered to, given that the access road to the site begins in a single-family residential neighborhood, and driveway entrance is located specifically between two residences.

Other

17 | While not related to CEQA, we recommend that you coordinate with the property owner, Morrison Ranch Homeowners' Association, at your earliest convenience regarding possible use of the proposed site.

Thank you for your consideration of these comments. If you have any questions, please contact Allison Cook, Assistant Planning Director, at (818) 597-7310 or at acook@ci.agoura-hills.ca.us.

Sincerely,



Greg Ramirez
City Manager

Responses to Comment Letter LR-2

The Authority appreciates the City of Agoura Hills' comments on the Draft Environmental Impact Report (EIR) dated February 24, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) (SCH #2014081025) for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project. We understand that the LMR system is a wireless communications system for mobile and portable devices, such as walkie-talkies and two-way radios, and would provide day-to-day voice and narrowband data radio communications coverage for emergency responders. The LMR system would consist of antennas and support equipment at up to 90 sites located mostly in Los Angeles County. However, a total of 94 sites have been considered. Of these, 40 sites were determined to be statutorily exempt from the California Environmental Quality Act (CEQA) under PRC Section 20180.25, and no further CEQA analysis is necessary. The DEIR considers the remaining 54 sites that were not statutorily exempt.

One of the LMR sites being considered in the DEIR is in the City of Agoura Hills. The site, referred to as "AGH/" is located at Kimberly Peak, off an unnamed road, near Kimberly Drive in the Morrison Ranch area of the City. The site is zoned, and designated in the City General Plan as, Open Space-Deed Restricted (OS-DR). There are no other sites in Agoura Hills being considered - either in the DEIR or that were found to be statutorily exempt from CEQA.

The DEIR indicates that the proposed improvements at the site include the installation of up to 27 whip antennas (each up to 15 feet long) and up to five (5) microwave antennas (each two (2) to six (6) feet in diameter) on a new 70-foot tall, 6.5-foot diameter monopole, with an additional lightning rod of 15 feet high, for a total 85 foot-tall facility. If tower obstruction lighting is required, it may include red or white LED lamps, either steady or flashing, on the monopole. Either an existing equipment shelter at the site may be used, or a new 600 square-foot shelter, either prefabricated or of concrete masonry unit - CMU, installed on a concrete slab. Exterior security lighting equivalent to one (1) 100-watt bulb would be installed. A diesel emergency generator on a 200-square-foot slab would be constructed and enclosed within a block wall, with a 1,500 gallon belly internal fuel tank integrated into the generator. About 800 feet of chain-link fence up to 12 feet in height is proposed around the facility. The depth of excavation is 36 feet for a drilled caisson for the monopole. In total, an area of 5,000 square feet would be disturbed to install the facilities, with permanent disturbance to a 3,000-square foot area.

We understand that best management practices (BMPs) have been incorporated into the project design to minimize impacts to environmental resources. Examples of BMPs listed in the DEIR include minimizing disturbed areas during construction; watering down the construction site; protecting slopes through erosion control blankets; and using erosion control measures to reduce siltation and runoff, among many others.

Response to Comment 1: The information provided in this comment is accurate.

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Comment 2: The DEIR lists seven groups of two or more proposed project sites that would be alternatives to each other. However, the AGH site is not listed here as an alternative or as a site to which there are alternatives being explored. Please discuss why no alternatives to the site are being considered.

Response to Comment 2: The Authority explored numerous options for providing LMR coverage to the City of Agoura Hills and the 101 Freeway areas. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. The area targeted includes both the north and south sides of the 101 Freeway in Agoura Hills, the City of Westlake Village (particularly the western side of the City), as well as the north facing slopes of the Santa Monica Mountains in order to penetrate the canyons and roads. Although there were other sites that existed (commercial carriers) or could be built (City of Westlake Village), no other viable sites were identified that could provide coverage for this area.

Comment 3: Given the various environmental impacts of the project at the AGH site, noted below, we recommend that alternatives to the facility at AGH be assessed in the DEIR. These could include reducing the height of the monopole (perhaps with a stronger support at the base); locating the antennas on an existing tower at the same site instead of constructing a new tower; and considering other sites nearby - within and outside of Agoura Hills, that would have less impacts. With regard to using an existing tower, DEIR Section 2.6.1 Collocation indicates that, "At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas." Please provide information to demonstrate this condition specifically at AGH. This section further states, "Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further." Please provide information demonstrating that locating the proposed facilities on an existing tower at the same site would not provide the desired coverage in this instance, particularly since the existing tower is located at the same site as AGH, and would be expected to provide the same, if not very similar, coverage. Additionally, while a project alternative considering all proposed LA-RICS facilities as collocations may not be feasible or desired, it seems appropriate to consider at least collocating the proposed facilities at the specific AGH site as a feasible alternative.

Response to Comment 3: Please see response to Comment 2, above, discussing the lack of other viable sites that could provide LMR coverage for this area. Regarding the comment on collocation, the Authority is considering numerous sites throughout the County for collocation where existing structures are able to meet the existing building codes and provide the level of stability necessary for a public safety network. The Authority has determined that the existing towers at Site AGH do not meet current building codes. Therefore, collocation on existing towers at Site AGH is not feasible under existing conditions and would require retrofitting to ensure the existing towers meet current building codes, which would add extra expense and may not ultimately be possible. Even if upgrade of the tower were feasible, collocation on existing towers at Site AGH would require the Authority to upgrade another entity's infrastructure without compensation and would put the Authority in a position of a lessee on that tower, which would very likely increase the cost of the site to the Authority and by extension, the tax payers. Additionally, it would not be technically feasible to collocate equipment on existing towers at Site AGH because the lower height of the existing towers would limit the amount of equipment the Authority could place on the towers and lower the coverage performance, which would result in a decreased ability to meet the project objectives in this geographic area.

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Comment 4: We suggest that the AGH site be considered visually sensitive given its location on top of a prominent hill that can be seen from many points in the City, including residential neighborhoods. In particular, the site is situated on a primary ridgeline, the Morrison Highlands, as identified on Figure NR-1 Open Space Resources in the Agoura Hills General Plan 2035 (2010). General Plan Goal NR-2 Visual Resources is for the *lip* reservation of significant visual resources as important quality of life amenities for residents, and as assets for commerce, recreation and tourism." General Plan Policy NR-2.3 Protect Ridgelines states, "Maintain the community's primary and secondary ridgelines." Additionally, the site is designated in the General Plan, and zoned, as Open Space-Deed Restricted (OS-DR). The purpose of the OS-DR zone, in part, is to preserve natural features and open space (Agoura Hills Municipal Code - AHMC Section 9490 et. seq.).

Response to Comment 4: Site AGH is located outside of the Santa Monica Mountains National Recreation Area on a ridgeline that is surrounded on all sides by dense residential development that has encroached to the base of the hills, and well into natural canyons, such as along Kimberly Drive to the east, Rolling Ridge Drive to the south, and Lake Lindero Drive to the west. Aerial maps display significant slopes cut into the hillside. Due to the extensive development surrounding the site, the Authority determined that Site AGH is located in an urban area rather than a rural or remote area, despite being in an area zoned by the City of Agoura Hills as open space. Urban areas that are not within the coastal zone or parklands are not considered visually sensitive.

The Draft EIR analyzes visual impacts for this project, including at Site AGH, using a quarter-mile radius as a visual buffer. Representative viewpoints in the City of Agoura Hills were selected in relation to this buffer to analyze visual effects, as shown below. Sites were chosen to represent typical views. As shown in the photos that follow, the existing site is not visible from Views 1 and 2. View 1 shows mature landscaping typical of the surrounding residential areas that would preclude views of the ridgeline from many residences. The dominant visual feature in View 2 is the significant slope cut for the road that provides access to residential development. Although the existing tower is visible from the ridgetop in View 3, it is not the dominant visual feature given the tower's size and scale. Rather, the foreground residential elements and the hill itself dominate the view. From this distance, the addition of another 70-foot tall monopole with a 15-foot tall lightning rod would still not dominate the view. The proposed new tower would also be a monopole, with less girth (and therefore, less visual intrusion) than the existing lattice towers. Therefore, the Draft EIR's conclusion that visual impacts would be less than significant at Site AGH is accurate and supported by substantial evidence.

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View 1: 5775 Willowtree Drive, Agoura Hills, CA, Looking Northeast (existing site not visible)



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View 2: 5774 Rista Drive, Agoura Hills, CA, Looking North (existing site not visible)



View 3: 29362 Castlehill Drive, Agoura Hills, CA, Looking West



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Comment 5: While we acknowledge that the AGH site is currently the location of several telecommunications-type facilities, the proposed LMR facility would add substantially more structures and a taller tower than what currently exists on the site, resulting in potentially significant aesthetic impacts from an increase in intensity of development, even though the AGH facilities may not block views. The AGH monopole could reach 85 feet tall, compared to the estimated maximum 60-foot high existing tower at the same location (per the DEIR). The AGH site, with the exception of some existing telecommunications equipment, is situated on a hilltop of the Santa Monica Mountains, in a natural area of the City where there is no hillside development. Single-family residential development is located below the hill, in the flatter portions of the City. The DEIR should analyze the potential impacts to aesthetics from the proposed LMR facilities located in this visually sensitive area. In particular, please consider the following:

1. Show the AGH site as being of high or medium viewer sensitivity on Figure 3.1.1.
2. Revise Table 3.1-1 to include the AGH site under the categories of, "Significant Ridgeline" and "Visual Sensitivity."
3. Address the AGH site in the discussion of Section 3.1.2.3 Local Regulatory Setting, specifically its location on a primary ridgeline in the General Plan.
4. Analyze the AGH site in Section 3.1.4.1 Project Analysis as a high or medium sensitivity site. Revise the discussion of AGH under Impact "AES-1" (Scenic Vista) beginning on page 3-28, Impact "AES-3" (Visual Character) beginning on page 3-34 and under Impact "AES-4" (Light or Glare) starting on page 3-41, accordingly.

Response to Comment 5: Please see Response to Comment # 4, above, regarding the visual sensitivity of Site AGH. The proposed structures at Site AGH include a monopole up to 70 feet tall with an additional 15-foot lightning rod, equipment racks to be located in an existing equipment shelter or a new 600-square foot shelter, a diesel generator and associated fuel tank, and up to 800 feet of chain-link fence up to 12 feet high. The site currently contains shelters and is surrounded by a chain link fence. A 600-square foot shelter, generator and fuel tank, and 800 feet of chain-link fence do not constitute substantially more structures that would result in significant impacts. The low height of these structures would make them indiscernible from nearby residential vantage points. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 6: Further, under the discussion of Impact "AES-3" on page 3.41, the reference to AGH being an "urban" area should be corrected. The site is set within a preserved open space area in a natural state, at the top of a primary ridgeline in the Santa Monica Mountains. The area below the hillside may be considered "urban," but not the hillside itself, even though there are telecommunications facilities presently. The text under the paragraph heading, "Urban Areas" states that these are, "... areas where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area ..." Given the minimal lighting at the site presently, and its remote location on the hilltop in the OS-DR zone in the Santa Monica Mountains, where there are no other urban light sources, this analysis should be revised.

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Response to Comment 6: Please see response to Comment # 4 regarding the visual sensitivity of Site AGH. Even though the site is located on a hilltop and not directly within the adjacent residential area, the proximity of urban encroachment has introduced human-caused light intrusions up to a quarter mile from the site, including vehicle headlights, traffic signals, street lights, etc. Residents within sight of the towers would be exposed to these existing light sources. In addition, the presence of the existing telecommunications facilities has already altered the “natural state” of the ridgeline, and the addition of any FAA-required lighting at site AGH would not substantially change this condition or increase the significance of any visual impact. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 7: The project should be considered to cause a potentially significant operational impact on aesthetics from lighting and/or glare from the proposed lighting equivalent to one (1) 100-watt bulb, and possibly FAA required lighting. With regard to the former, the City has policies to shield and direct downward all exterior lighting to prevent light spillover and/or glare (*City Architectural Design Standards & Guidelines*, Section III.G Exterior Lighting). The DEIR should reference and incorporate these requirements as a mitigation measure. We request that LA-RICS consider as minimal lighting as feasible at this site, given the surrounding natural area and visibility from numerous points in the City.

Response to Comment 7: Implementation of the proposed project will comply with FAA requirements, which stipulate that tower lighting, where required, be visible to pilots from above. Section AES-4 on page 3-41 of the Draft EIR also notes that, because of the presence of existing light sources in the adjacent residential areas, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact. Plans for any grounds lighting at the site will include consideration of neighboring uses, along with other factors such as site security and safety. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 8: This section identifies vegetation communities in and around the AGH site. The DEIR identifies the site being within a California walnut woodland. The site is also set within an area of coastal sage scrub habitat, which should be addressed in the analysis of impacts to biological resources. Specifically, please consider the following:

1. Table 3.3-1 should include AGH as a site within the "Coastal sage scrub" vegetation community. (Note that this community is listed as being within the area of AGH in Table 3.3-3).
2. Table 3.3-4 should be corrected to list AGH under "California Walnut Woodland," consistent with the discussion in this section.
3. Within DEIR Section 4.0 Site Summary Forms, the Mitigation Measure under Impact B10-2 (substantial adverse impact on riparian habitat or other sensitive natural community) reads, "Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut trees to protect the plant's root system." However, this Mitigation Measure does not appear to be referenced in the Biological Resources section or elsewhere in the DEIR. Please incorporate this mitigation into a formal Mitigation Measure and reference it where appropriate for site AGH.

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Response to Comment 8: Table 3.3-1 will be revised in the Final EIR to include Site AGH under coastal sage scrub. Table 3.3-4 will be revised in the Final EIR to include Site AGH under California walnut woodland. Regarding the comment on mitigation for Impact BIO-2, the text referenced in the comment provides the same protection as mitigation measure **BIO MM 9 Protect Native Vegetation and Common Wildlife**. Because BIO MM 9 is applicable to Site AGH, the referenced text is redundant, and will be deleted from page 4-12. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 9: We appreciate that Mitigation Measures CUL 6 and CUL 7 related to protecting paleontological resources have been incorporated into the DEIR for site AGH. Table 3.4-4 lists Mitigation Measure CUL 1 (archaeological monitoring), CUL 3 (unexpected discovery of archaeological remains), and CUL (unexpected discovery of human remains) as applicable to site AGH. Yet, Table ES-2 Environmental Impacts and Mitigation Measures in the Executive Summary does not list these mitigation measures for AGH...

Response to Comment 9: Footnotes to Tables 3.4-3 and 3.4-4 in the Draft EIR state that no impacts to historic resources are expected at Site AGH; however, mitigation in the form of monitoring is required at the site at the request of the Soboba Band of Luiseno Indians. Pages 4-14 through 4-16 of the Draft EIR provide the same statement. The following note from Tables 3.4-3 and 3.4-4 applies to Site AGH and will be added as a footnote to Table ES-2 to provide clarification:

² Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Comment 10: ...and the Summary Form for AH in DEIR Section 4.0 Site Summary Forms does not list these mitigation measures as applicable for AGH. Please correct this discrepancy.

Response to Comment 10: Pages 4-14 and 4-15 of the Draft EIR currently describe the archaeological resources and mitigation measures at Site SGH. None of the identified archaeological resources are historical resources as defined under CEQA and, based on their nature and integrity, would not meet the CEQA criteria. This information is provided under CUL-1, CUL-2, CUL-4, and CUL-5. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 11: While the DEIR notes that no identified archaeological sites have been identified within 0.5 mile of the site, Agoura Hills in general is considered a sensitive archaeological area, and discovery of previously unknown cultural resources is possible.

Response to Comment 11: The footnote to Draft EIR Table 3.4-4 indicates that no archaeological sites have been identified within the direct APE (i.e., the project ground-disturbing footprint). Pages 4-14 and 4-15 indicate that three archaeological sites have been recorded within the 0.5 mile radius around Site AGH but would not be impacted by construction. None of the identified archaeological resources are historical resources as defined under CEQA and, based on their nature and integrity, would not meet the CEQA criteria. This information is provided under CUL-1, CUL-2, CUL-4, and CUL-5. Therefore, no changes to the Draft EIR are required in response to this comment.

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Comment 12: As such, the City typically incorporates mitigation measures in construction projects to have an archaeologist and Native American representative monitor subsurface work, and, in the event human remains are uncovered, follow procedures as outlined in the CEQA Guidelines and required under state and federal law. Please ensure that such protective measures are incorporated into the DEIR for site AGH.

Response to Comment 12: Mitigation measures for the protection of cultural resources have been described on pages 3-314 and 3-315 of Section 3.4.5.1 of the Draft EIR and applied to Site AGH at pages 4-14 and 4-15. The appropriate mitigation measures are shown in Draft EIR Table 3.4-4 and noted in Draft EIR Chapter 4 under CUL-1, CUL-2, CUL-4, and CUL-5 for the site. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 13: Table 3.9-4 states that the height limit in the OS-DR zone, where the facilities are proposed, is 60 feet. The OS-DR standards in the Agoura Hills Municipal Code do not list 60 feet as the maximum allowed height. Please also note that the proposed facility is not listed as an allowed use in the OS-DR zone. Consequently, please correct Section 4.0 Site Summary Forms notes under "Setting" and "Impact Analysis" that the required permit would be a Conditional Use Permit.

Response to Comment 13: Table 3.9-4 and page 4-28 of the Draft EIR notes will be revised to reflect the OS-DR zoning restrictions. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 14: In addition to the City's Zoning Ordinance, the General Plan 2035 (2010), Chapter 5: Community Safety, Noise section, addresses noise in Agoura Hills. Please list the appropriate General Plan standards in DEIR Table 3.10-2 and analyze potential noise impacts from ongoing operation of AGH in light of these standards. Specifically, see Table N-1 (Noise/Land Use Compatibility Matrix) and Table N-2 (Interior/Exterior Noise Standards) of the General Plan.

Response to Comment 14: Table 3.10-2 text will be revised to include the referenced City's General Plan noise standards. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of any environmental impact.

Comment 15: This section of the DEIR estimates the potential operational noise from the facility as 58 dBA at 21 feet away for the emergency generator (assuming solid walls around it, as proposed), and 52 dBA at 10 feet away for the HVAC systems. Please confirm that this estimate would be accurate specifically for AGH, considering that the site would be located on a hilltop, with residential uses below.

Response to Comment 15: Estimated noise levels from operation of Site AGH are provided on pages 4-31 and 4-32 of the Draft EIR, and are consistent with the estimates referenced in the comment. Therefore, no changes to the Draft EIR are required in response to this comment.

Comment 16: The DEIR lists the allowed hours of construction noise pursuant to the Municipal Code, which are from 7:00 a.m. to 7:00 p.m. during the weekdays and on Saturdays. We request that these hours be strictly adhered to, given that the access road to the site begins in a single-family residential neighborhood, and driveway entrance is located specifically between two residences.



Responses to Comment Letter LR-2

Response to Comment 16: The comment has been noted. No changes to the Draft EIR are required in response to this comment.

Comment 17: While not related to CEQA, we recommend that you coordinate with the property owner, Morrison Ranch Homeowners' Association, at your earliest convenience regarding possible use of the proposed site.

Response to Comment 17: The comment has been noted. No changes to the Draft EIR are required in response to this comment.



Comment Letter LR-3



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Ryan Gohlich, AICP
Assistant Director/City Planner
Community Development Department
City of Beverly Hills
455 N. Rexford Drive
Beverly Hills, California 90210

Dear Mr. Gohlich:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Beverly Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-3



February 25, 2014

Ms. Nancy Yang, Project Engineer
Los Angeles Regional Interoperable Communications System Joint Powers Authority
2525 Corporate Lase, Suite 100
Monterey Park, California 91754

RE: Notice of Availability of a Draft Environmental Impact Report – LA RICS Land Mobile Radio (LMR) Project (SCH #2014081025)

Dear Ms. Nancy Yang:

Thank you for providing the City of Beverly Hills (City) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the LA RICS LMR Project (Project). Because a portion of the project is located in the City of Beverly Hills, there is a potential that the City of Beverly Hills and its residents could experience negative impacts both during the construction of this project and as a result of operation thereafter. The City is requesting that the following comments be considered, and, as appropriate, addressed in the Final Environmental Impact Report for the Project.

LOCATION

- 1 | The City is concerned about the use of the Walker drive site for the LA RICS Facility due to the fact that it is a relatively small site and there are a number of other facilities already occupying the space.
- 2 | Further, the City would like to reserve additional space existing on the site for the expansion of City infrastructure. For this reason, the City is opposes the use of this site for the LA RICS LMR Project.



Comment Letter LR-3

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TRANSPORTATION/TRAFFIC

3 | The City has concerns about construction equipment in the Trousdale Estates area. Should the Project move forward at the Walker Drive Site please consult with the City’s Transportation Division to ensure that all hauling and Trousdale Construction regulations are being followed. Please call 310.285.1141 for more information.

NOISE

4 | The City continues to have concerns about the potential noise impacts resulting from the construction of the proposed Project. The Trousdale Estates area is a residential neighborhood and construction noise resulting from excavators, trucks and jackhammers would be disruptive to the residents of the neighborhood.

SAFETY AND SECURITY

5 | The City of Beverly Hills Police Department is currently working on a plan to increase security measures and limit access to the Walker Drive site. The addition of equipment on this site is of particular concern to the City due to the fact that it may increase the need for vendors or maintenance teams to access the site.

GEOLOGY AND SOILS

6 | The City has concerns regarding ground stability at the proposed project site due to the fact that it is located in a potential landslide zone area as designated by the California Department of Conservation, California Geological Survey.

HAZARDS AND HAZARDOUS MATERIALS

7 | The City of Beverly Hills is opposed to the introduction of hazardous materials (the proposed diesel fuel tank) on the Walker Drive site as it is located in a residential neighborhood.

AESTHETICS

8 | The City is concerned about the potential aesthetic impacts that the Project may have on the surrounding neighborhood. The extension of the existing tower at the Walker Drive site could negatively impact the views from the surrounding residential properties. Further, the City is concerned about the proposed red or white LED lamps that may be installed as part of the project, as well as the proposed exterior security lighting on the 600 square foot equipment shelter. Lighting of this nature is incompatible with the residential neighborhood surrounding the Project site.



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LA RICS LMR DEIR Comment Letter
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LAND USE AND PLANNING

10 The DEIR suggests that the General Plan Designation for the site is Single Family Residential – Low Density and the Zoning is One Family Residential. The Zoning for the parcel is “Parks, Reservoirs, Government (Unzoned)”, please revise.

CULTURAL RESOURCES

11 As a telecommunications project that involves the Federal Communications Commission (FCC), Section 106 review is required to study the impact on historic and cultural resources. Please identify if a Section 106 review has been completed, pursuant to the programmatic agreement. As an interested party, please provide us with a copy of the report.

12 Under Impact Analysis CUL-1, it appears that historic resources within the City of Los Angeles were studied, but not within Beverly Hills. Direct and indirect / visual impacts to historic resources to the immediate site (water tower and surroundings) and the adjacent neighborhoods (i.e. Trousdale Estates) in Beverly Hills should be studied and addressed in your analysis.

Thank you again for this opportunity to provide input on the Draft Environmental Impact Report. The City of Beverly Hills is looking forward to working with the Joint Powers Authority to discuss appropriate and adequate mitigation measures and project alternatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Gohllich", is written over a light blue horizontal line.

RYAN GOHLICH, AICP
Assistant Director/City Planner,
Community Development Department

cc: Mahdi Aluzri, City Manager
George Chavez, Assistant City Manager
Susan Healy Keene, AICP, Director of Community Development
Aaron Kunz, AICP, Deputy Director of Transportation
Scott Stephens, Fire Battalion Chief
Lincoln Hoshino, Police Sergeant



Responses to Comment Letter LR-3

The Authority appreciates the City of Beverly Hills' comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: The City is concerned about the use of the Walker drive site for the LA RICS Facility due to the fact that it is a relatively small site and there are a number of other facilities already occupying the space.

Response to Comment 1: The City's concerns are noted. No revisions to the Draft EIR are required in response to this comment.

Comment 2: Further, the City would like to reserve additional space existing on the site for the expansion of City infrastructure. For this reason, the City is opposes the use of this site for the LA RICS LMR Project.

Response to Comment 2: The City's concerns are noted. No revisions to the Draft EIR are required in response to this comment.

Comment 3: The City has concerns about construction equipment in the Trousdale Estates area. Should the Project move forward at the Walker Drive Site please consult with the City's Transportation Division to ensure that all hauling and Trousdale Construction regulations are being followed? Please call 310.285.1141 for more information.

Response to Comment 3: The City's comments are noted. If the site is included in the final design, the Authority will consult with the City Transportation Division prior to initiation of construction at the site. No revisions to the Draft EIR are required in response to this comment.

Comment 4: The City continues to have concerns about the potential noise impacts resulting from the construction of the proposed Project. The Trousdale Estates area is a residential neighborhood and construction noise resulting from excavators, trucks and jackhammers would be disruptive to the residents of the neighborhood.

Response to Comment 4: The City's noise standards were considered in the Draft EIR, as discussed in Section 3.10.2.3, Local Regulatory Setting. Site-specific noise analysis is also provided beginning at page 4-1904 of the Draft EIR. No revisions to the Draft EIR are required in response to this comment.

Comment 5: The City of Beverly Hills Police Department is currently working on a plan to increase security measures and limit access to the Walker Drive site. The addition of equipment on this site is of particular concern to the City due to the fact that it may increase the need for vendors or maintenance teams to access the site.

Response to Comment 5: The City's concerns are noted. If the site is included in the final design, the Authority will coordinate with the City regarding access at the site. No revisions to the Draft EIR are required in response to this comment.

Responses to Comment Letter LR-3

Comment 6: The City has concerns regarding ground stability at the proposed project site due to the fact that it is located in a potential landslide zone area as designated by the California Department of Conservation, California Geological Survey.

Response to Comment 6: The Draft EIR discusses landslide hazards associated with Site WAD in Section 3.5.1.1 and Table 3.5-2. Site specific information regarding the geology of the site is provided beginning at page 4-1890 of the Draft EIR. The Draft EIR identifies that the site lies within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be collocated to existing lattice structure, therefore a geotechnical study for new structures would not be required. Therefore impacts would be less than significant. No revisions to the Draft EIR are required in response to this comment.

Comment 7: The City of Beverly Hills is opposed to the introduction of hazardous materials (the proposed diesel fuel tank) on the Walker Drive site as it is located in a residential neighborhood.

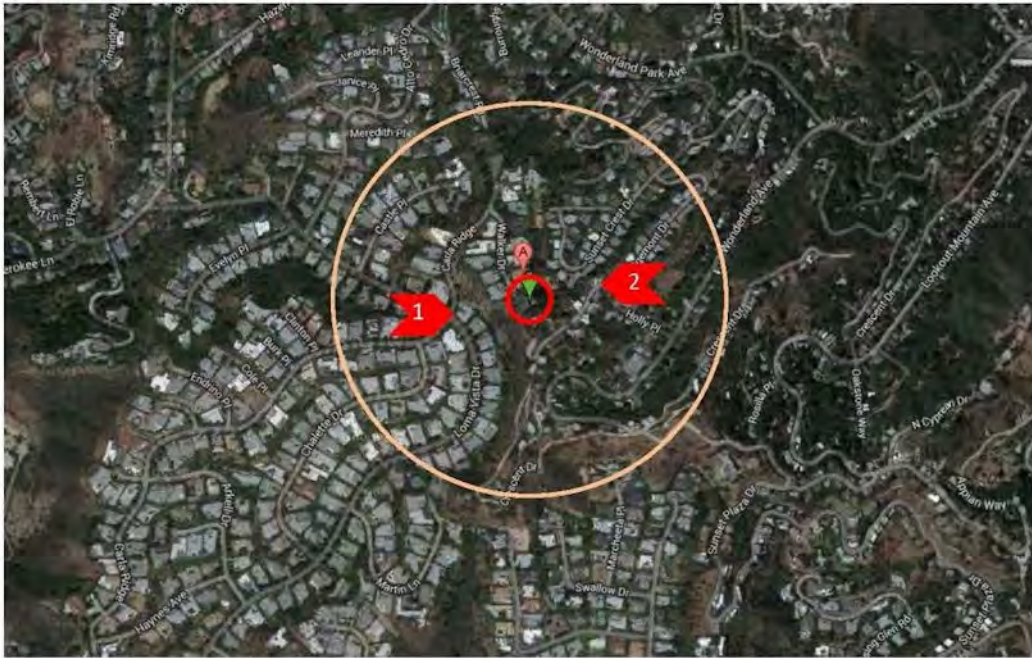
Response to Comment 7: The City's concerns are noted. Management of diesel fuel and other hazardous substances is discussed in Section 3.7 of the Draft EIR, and specific analysis is provided for Site WAD beginning at page 4-1895. As noted in the Draft EIR, management of hazardous substances would occur in accordance with all Federal, state and local regulations. No revisions to the Draft EIR are required in response to this comment.

Comment 8: The City is concerned about the potential aesthetic impacts that the Project may have on the surrounding neighborhood. The extension of the existing tower at the Walker Drive site could negatively impact the views from the surrounding residential properties.

Response to Comment 8: Aesthetic effects of the project were evaluated in Section 3.1 of the Draft EIR with specific analysis provided for Site WAD beginning at page 4-1877. A large water tank, one-story pumping house, three small equipment shelters, narrow lattice tower, and 120-foot-tall monopole are currently present on the proposed site. No additional towers or monopoles would be built at this site; rather, the project proposes to add up to 20 whip and up to 5 microwave antennas on the existing 120-foot monopole, and extend the existing monopole height up to an additional 20 feet. The project also proposes adding a lightning rod that would be up to 15 feet high, and potentially build a 600-square-foot equipment shelter. The visual analysis considered the setting of the site, which includes single-family houses that are typically one story and of various designs. The area's topography is hilly and the existing towers are only intermittently visible due to the topography and mature, dense vegetation. Further, the existing structures on the site, as well as telephone poles and wires that line the narrow streets, currently intrude on views. Despite the height of the existing towers on the site, they are only intermittently visible due to the area's topography and vegetation, as provided below.

Responses to Comment Letter LR-3

Map of viewpoints – site WAD



View: Looking West from 2150 Ridgmont Drive, Los Angeles, CA



Responses to Comment Letter LR-3

View 2: Looking East from 1896 Loma Vista Drive, Beverly Hills, CA



The visual analysis found that the proposed new facilities would be compatible with the existing visual character and quality of the site, which is low due to the presence of manmade development. Despite extending the height of the existing tower, the tall trees that currently surround the site and the varying topography of the area would continue to obscure most of the site from view as they do today. Although the proposed project would result in visual changes to the site; the proposed project would result in less than significant visual impacts for the reasons stated above. No changes to the Draft EIR are required in response to this comment.

Comment 9: Further, the City is concerned about the proposed red or white LED lamps that may be installed as part of the project, as well as the proposed exterior security lighting on the 600 square foot equipment shelter. Lighting of this nature is incompatible with the residential neighborhood surrounding the Project site.

Response to Comment 9: The City's concerns are noted. Effects from lighting or glare were evaluated in Section 3.1 of the Draft EIR, with site specific analysis for light and glare concerns for Site WAD provided at page 4-1878. Site WAD is located within a suburban area with extensive development adjacent to the site. The site is located in an area where numerous sources of lighting are present, such as vehicle headlights, street lights, and residential lighting. The Draft EIR also notes that, because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact. A new equipment shelter, if built, would be visually subordinate to, and likely blocked by, the existing structures on the site. Further, the exterior security lighting on the new shelter would be equivalent to a 100-watt light bulb. For these reasons, security lighting on the shelter would result in a less than significant visual impact. No changes to the Draft EIR are required in response to this comment.

Comment 10: The DEIR suggests that the General Plan Designation for the site is Single Family Residential — Low Density and the Zoning is One Family Residential. The Zoning for the parcel is "Parks, Reservoirs, Government (Unzoned)", please revise.

Responses to Comment Letter LR-3

Response to Comment 10: Table 3.9-4 in the Draft EIR will be revised to reflect the proper zoning classification. This revision does not result in any change to the impact conclusions in the Draft EIR.

Comment 11: As a telecommunications project that involves the Federal Communications Commission (FCC), Section 106 review is required to study the impact on historic and cultural resources. Please identify if a Section 106 review has been completed, pursuant to the programmatic agreement. As an interested party, please provide us with a copy of the report.

Response to Comment 11: Compliance with Section 106 of the National Historic Preservation Act is not a CEQA requirement. However, it is required pursuant to FCC regulations. Section 106 through the FCC's Form 620/621 process is ongoing, but has not yet been completed for Site WAD. Prior outreach was conducted with the City via correspondence dated August 29, 2014. City representatives William Crouch and Reina Kapadia spoke with the Authority's cultural consultant from Jacobs Engineering (Dr. Paige Peyton). If the site is included in the final design, and upon completion of the 620/621 process, the Authority will be in a position to provide updated information to the City of Beverly Hills consistent with state and federal regulations protecting cultural resources.

Comment 12: Under Impact Analysis CUL- 1, it appears that historic resources within the City of Los Angeles were studied, but not within Beverly Hills. Direct and indirect / visual impacts to historic resources to the immediate site (water tower and surroundings) and the adjacent neighborhoods (i.e. Trousdale Estates) in Beverly Hills should be studied and addressed in your analysis.

Response to Comment 12: Historic resources were identified and assessed for impacts within a 0.5 mile radius of site WAD as stipulated in the *Nationwide Programmatic Agreement for Review under the National Historic Preservation Act (2005)* between the Federal Communications Commission, Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.. The assessment encompassed the water tank site, the surrounding neighborhood, and Trousdale Estates. A discussion of cultural resources is provided in the Draft EIR at Section 3.4, and site-specific impact analysis and recommended mitigation measures are found for Site WAD beginning at page 4-1887. Significant impacts would be reduced to less than significant with incorporation of CUL MM 5 which requires architectural camouflage is required to minimize the visual effects of the proposed increase in the height of the monopole on identified historical resources within the indirect APE. No changes to the Draft EIR are required in response to this comment.



Comment Letter LR-4



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Michael Hofflinger, Associate Planner
City of Chino Hills
14000 City Center Drive
Chino Hills, California 91709

Dear Mr. Hofflinger:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Chino Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-4

City of Chino Hills



14000 City Center Drive
Chino Hills, CA 91709
(909) 364-2600
www.chinohills.org

February 25, 2016

Nancy Yang
2525 Corporate Place Suite 100
Monterey Park, CA 91754

Subject: Land Mobile Radio Project DEIR

Ms. Yang:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Land Mobile Radio Project. After carefully looking at the proposed project, which consists of ninety (90) potential sites for the installation of an emergency radio tower, the City of Chino Hills has the following comments;

- 1 | 1. On page 1-9 under Statutory Exemption sites, Pomona 1620 Hillcrest (PSH) is listed as an exempt location. The remainder of the DEIR does not analyze this location as a potential site for a communication tower, only the Aerojet site (AJT). Please clarify that there is only one (1) site within the City of Chino Hills.
- 2 | 2. On page 2-48 under Comprehensive list of projects within two miles, please update the status of the following projects;
 - a. Stonefield – Post Entitlement Review (Construction/Grading Plan Review)
 - b. Canyon Hills – Under Construction
- 3 | 3. On page 3-434 under Table 3.9-4, Pursuant to Section 16.10.030, the maximum building height for Rural Residential (R-R) zone is 35 feet. Please correct maximum height limit under table. Also on page 4-64 refers to building height.
- 4 | 4. Please note that a Site Development Permit Application will be required if the project will be located on an existing tower or structure. If the proposal includes a new facility, a Conditional Use Permit will be required.

Sincerely,

Michael Hofflinger
Associate Planner

City Council: Art Bennett ▪ Ed M. Graham ▪ Ray Marquez ▪ Cynthia Moran ▪ Peter J. Rogers

Responses to Comment Letter LR-4

The Authority appreciates the City of Chino Hills' comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: On page 1-9 under Statutory Exemption sites, Pomona 1620 Hillcrest (PSH) is listed as an exempt location. The remainder of the DEIR does not analyze this location as a potential site for a communication tower, only the Aerojet site (AJT). Please clarify that there is only one (1) site within the City of Chino Hills.

Response to Comment 1: The Authority found Site PSH statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk's office on November 13, 2014. None of the sites listed Draft EIR Table 1.3-1, including Site PSH, are analyzed within the EIR, with the exception statutorily exempted LMR sites were considered in the cumulative impact analysis as described in Section 2.7. However, any of the sites identified in Draft EIR Table 1.3-1 could be constructed as part of the LMR System. As noted by the commenter, Site AJT is analyzed in the Draft EIR, with site-specific analysis provided beginning at page 4-38. Therefore, up to two sites, PSH and AJT, may be constructed within the City of Chino Hills as part of the LMR project.

Comment 2: On page 2-48 under Comprehensive list of projects within two miles, please update the status of the following projects; a. Stonefield - Post Entitlement Review (Construction/Grading Plan Review); b. Canyon Hills - Under Construction

Response to Comment 2: The status of the Stonefield and Canyon Hills project in Table 2.7-1 will be updated in the Final EIR per your comments. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of an environmental impact.

Comment 3: On page 3-434 under Table 3.9-4, Pursuant to Section 16.10.030, the maximum building height for Rural Residential (R-R) zone is 35 feet. Please correct maximum height limit under table. Also on page 4-64 refers to building height.

Response to Comment 3: Response to Comment 3: The Authority concurs that the maximum height should be revised to 35 feet on both pages 3-434 and 4-64 based on the zoning as Rural Residential. This change is consistent with Section 16.10.030 and 16.44.060 of the Chino Hill Development Code that states: "... no major facility may exceed the maximum building height for the applicable zoning district...", which is 35 feet for R-R unless otherwise approved by the planning commission. Since Site AJT is a collocation to an existing tower, i.e., equipment would be installed on an existing lattice tower without exceeding the current overall height of the structure including appurtenances, proposed improvements at this site would still be consistent with Chapter 16.44 of the development code and no other changes to the Draft EIR would be required. These revisions to the Final EIR do not result in any new significant impact or an increase in the severity of an environmental impact.

Comment 4: Please note that a Site Development Permit Application will be required if the project will be located on an existing tower or structure. If the proposal includes a new facility, a Conditional Use Permit will be required.

Response to Comment 4: The information provided by the City regarding permitting is noted.



Comment Letter LR-5



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Sam Lee, Director
Planning & Building and Safety
City of El Segundo
350 Main Street
El Segundo, California 90245

Dear Mr. Lee:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of El Segundo on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-5

From: Tagle, Mickie
Sent: Tuesday, February 23, 2016 4:21:02 PM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Cc: Lee, Sam
Subject: LA-RICS LMR Project - Draft EIR

Hello,

Three things please:

- 1) Please update your records and replace retired City of El Segundo staff member, Kim Christensen's contact information with Director of Planning & Building Safety, **Sam Lee's**. Slee@ElSegundo.org or 310-524-2345.
- 2) We received and letter subject: Notice of Availability of the Draft Environmental Impact Report. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>)
- 3) I scanned through the DEIR and did not find any of the proposed LMR sites in the City of El Segundo. **Kindly confirm.** (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-January-2016.pdf>)

Thank you. I'll be on standby for your reply.

Mickie Tagle
310-524-2303
mtagle@elsegundo.org

City of El Segundo
350 Main Street
El Segundo, CA 90245

Economic Development www.elsegundobusiness.com
City-wide www.elsegundo.org

Responses to Comment Letter LR-5

The Authority appreciates the City of El Segundo's comments on the Draft Environmental Impact Report (EIR) dated February 23, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Please update your records and replace retired City of El Segundo staff member, Kim Christensen's contact information with Director of Planning & Building Safety, Sam Lee's. SLee@ElSegundo.org or 310-524-2345.

Response to Comment 1: We have noted the change in staffing for our records. Thank you.

Comment 2: We received and letter subject: Notice of Availability of the Draft Environmental Impact Report. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>)

Response to Comment 2: The commenter's receipt of the Notice of Availability has been noted.

Comment 3: I scanned through the DEIR and did not find any of the proposed LMR sites in the City of El Segundo. Kindly confirm. (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMRDEIR-January-2016.pdf>)

Response to Comment 3: The commenter is correct. There are no LMR sites proposed within the City of El Segundo.



Comment Letter LR-6



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY
Overnight Delivery

March 11, 2016

Mr. Chris Jeffers, City Manager
City of Glendora
116 E. Foothill Boulevard
Glendora, California 91741-3380

Dear Mr. Jeffers:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Glendora on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

c: Mr. Wayne Leech, City Attorney



Comment Letter LR-6

CHATTEN-BROWN & CARSTENS LLP
2200 PACIFIC COAST HIGHWAY
SUITE 318
HERMOSA BEACH, CALIFORNIA 90254
www.cbcearthlaw.com

Telephone: (310) 798-2400
Facsimile: (310) 798-2402

E-mail:
DPC@CBCEARTH.LAW.COM

February 19, 2016

Nancy Yang
LA-RICS Project Team
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

~~RECEIVED
MAR 23 2016
LA-RICS~~

RECEIVED
FEB 23 2016
LA-RICS

Re: LA-RICS –LMR EIR

Dear Ms. Yang:

We have been retained as special counsel to the City of Glendora (City) with regard to the LA-RICS proposal to construct communication towers in the Los Angeles region.

1 We have previously written to you on March 5, 2015 regarding the potential location of communications towers at three Los Angeles County owned fire stations within City limits has not been sufficiently coordinated with the City. (A copy of this March 5, 2015 letter is attached.) We are pleased to see these communication towers are not among the towers proposed in the EIR for this project. We ask that you immediately contact us, City Attorney Wayne Leech, City Manager Chris Jeffers and Planning Director Jeff Kugel if our understanding is incorrect, or if there is a proposal to change this project to include such towers in the City of Glendora as we would strongly object to such a proposal.

2 With regard to the project as it is set forth now, we note there are two new towers proposed for Johnstone Peak. (DEIR, p. 2-17.) These are set forth as being within the jurisdiction of the US Forest Service. These towers would be visible from the City of Glendora, and would potentially interfere with the operation of a communication tower that the City currently maintains there.

3 Therefore, we ask that more detail be provided about this potential proposal. Specifically, since the original proposal of the LA-RICS project, the national forest in this area has received National Monument status as of October 2014, (<http://news.nationalgeographic.com/news/2014/10/141008-san-gabriel-mountains-national-monument-conservation/>.) We believe additional investigation should be



Comment Letter LR-6

Nancy Yang
February 19, 2016
Page 2

3 initiated to determine if the additional towers at the Johnstone Peak location are compatible with the new, more protective designation of the National Monument.

4 Furthermore, we are concerned about the potential for interference of operations- both by physical obstruction and by electromagnetic interference- of tower proposal on Johnstone Peak with the City's current communications tower. Potential mitigation measures should be included to address potential interference with the existing communications tower infrastructure.

Conclusion.

5 The LA-RICS project is obviously important to the future of public safety in the local region. Therefore, the City has been a supportive member of the Joint Powers Authority that is implementing this project, and as helpful as possible to you in carrying it out. However, as a member of the JPA we believe the best project possible, with the least damaging environmental impacts possible, should be developed.

Please feel free to contact City Attorney Wayne Leech or City Manager Chris Jeffers directly about this matter. We ask that you do so as soon as possible.

Sincerely,


Douglas P. Carstens

Cc:
City Council
City Manager
City Attorney
LA RICS Special Counsel Nicole Gordon
LA RICS General Counsel Truc L. More
LA RICS Executive Director Patrick Mallon

Responses to Comment Letter LR-6

The Authority appreciates the City of Glendora's comments on the Draft Environmental Impact Report (EIR) dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: We have previously written to you on March 5, 2015 regarding the potential location of communications towers at three Los Angeles County owned fire stations within city limits has not been sufficiently coordinated with the City. (A copy of this March 5, 2015 letter is attached.) We are pleased to see these communication towers are not among the towers proposed in the EIR for this project. We ask that you immediately contact us, City Attorney Wayne Leech, City Manager Chris Jeffers and Planning Director Jeff Kugel if our understanding is incorrect, or if there is a proposal to change this project to include such towers in the City of Glendora as we would strongly object to such a proposal.

Response to Comment 1: The Authority received the letter sent on March 5, 2015, which contained comments related to the LA-RICS Public Safety Broadband Network (PSBN), also known as the Long Term Evolution (LTE) communications system project, and responded via letter dated March 13, 2015. The previously approved LTE system is a separate project from the LA-RICS Land Mobile Radio (LMR) system project that is the subject of the current EIR. Construction of the LTE Project began in December 2014 and was completed in December 2015. No LTE facilities were constructed in the City of Glendora.

Similarly, there are no LMR sites proposed within the City of Glendora.

Comment 2: With regard to the project as it is set forth now, we note there are two new towers proposed for Johnstone Peak. (DEIR, p.2-17.) These are set forth as being within the jurisdiction of the US Forest Service. These towers would be visible from the City of Glendora, and would potentially interfere with the operation of a communication tower that the City currently maintains there.

Response to Comment 2: The Draft EIR analyzes two LMR facilities identified as Johnstone Peak-1 (JPK) and Johnstone Peak-2 (JPK2). As explained in Draft EIR section 2.3 (p. 2-41), the Authority would construct a new LMR lattice tower at only one of the two proposed sites on Johnstone Peak. At either of these sites, the tower could be visible from the City of Glendora, as well as from other observation points. The Draft EIR concludes that impacts to aesthetic resources from project construction at either of these sites would be less than significant, as noted in Draft EIR pages 4-724 through 4-726, and 4-763 through 4-765. Regarding interference, the frequencies used by the antennas to be mounted on any tower installed at Johnstone Peak will be reviewed as part of the FCC licensing process, which sets standards to preclude potential interference to existing communications infrastructure.

Comment 3: Therefore, we ask that more detail be provided about this potential proposal. Specifically since the original proposal of the LA-RICs project, the national forest in this area has received National Monument status as of October 2014. (<http://news.nationalgeographic.com/news/2014110/141008-san-gabriel-mountainsnational-monument-conservation/>.) We believe additional investigation should be initiated to determine if the additional towers at the Johnstone peak location are compatible with the new, more protective designation of the National Monument.

Responses to Comment Letter LR-6

Response to Comment 3: The Authority is aware that sites JPK and JPK2 are on lands designated as a National Monument in October 2014, and this fact is referenced several times in the Draft EIR where relevant to the analysis of environmental impacts (an example is provided at page 3-106). The Authority will continue to work with the U.S. Forest Service during the permitting process for LMR communications infrastructure developed at Johnstone Peak. The commenter may wish to note the federal register proclamation (emphasis added) that created the San Gabriel Mountains National Monument found at [\[https://federalregister.gov/a/2014-24849\]](https://federalregister.gov/a/2014-24849) states:

“Nothing in this proclamation shall be construed to interfere with the operation or maintenance, nor with the replacement or modification within the existing authorization boundary, of existing water resource, flood control, utility, pipeline, or telecommunications facilities that are located within the monument, subject to the Secretary of Agriculture’s special uses authorities and other applicable laws. Existing water resource, flood control, utility, pipeline, or telecommunications facilities located within the monument may be expanded, and new facilities may be constructed within the monument, to the extent consistent with the proper care and management of the objects protected by this proclamation, subject to the Secretary of Agriculture’s special uses authorities and other applicable law.”

As summarized in Draft EIR Table ES-2, starting on page ES-36, all environmental impacts at sites JPK and JPK2 will be less than significant with incorporation of appropriate mitigation.

Comment 4: Furthermore, we are concerned about the potential for interference of operations both by physical obstruction and by electromagnetic interference of tower proposal on Johnstone Peak with the City’s current communications tower. Potential mitigation measures should be included to address potential interference with the existing communications tower infrastructure.

Response to Comment 4: This comment addresses mechanical interference, which is not an environmental issue that requires a response for purposes of CEQA (CEQA Guidelines §15088). Nevertheless, the FCC licensing process, as well as the U.S. Forest Service special use permit application review process require coordination among frequency licensees and between a permit applicant and existing permit holders, respectively, to avoid interference. Any LMR installation at Johnstone Peak would comply with both processes.

Comment 5: The LA-RICS project is obviously important to the future of public safety in the local region. Therefore, the City has been a supportive member of the Joint powers Authority that is implementing this project, and as helpful as possible to you in carrying it out. However, as a member of the JPA we believe the best project possible, with the least damaging environmental impacts possible, should be developed.

Response to Comment 5: The Authority appreciates the support of the City of Glendora. The Authority will continue to comply with CEQA and all other applicable regulatory requirements in development of the LMR system.



Comment Letter LR-7



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Brian James, Planning Director
City of Industry
15625 E. Stafford Street
Industry, California 91744-0366

Dear Mr. James:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Industry on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-7

DraftEIR Hotline

From: Brian D James <BJames@cityofindustry.org>
Sent: Tuesday, January 26, 2016 9:59 AM
To: DraftEIR Hotline
Subject: Comments on the EIR for the Los Angeles Regional Interoperable Communications System (LA-RICS) proposed Land Mobile Radio system

Thank you for providing the Draft Environmental Impact Report (EIR) for the Los Angeles Regional Interoperable Communications System (LA-RICS) proposed Land Mobile Radio (LMR) system. Please accept the following comments on the Draft EIR:

- 1 | • Two facilities were found statutorily exempt and have already been constructed in the City of Industry. These are not addressed at all in the EIR, specifically section 1.3.2 and Table 1.3-1. These facilities should be accounted for in the LA-RICS system design and appear not to be.
- 2 | • Neither the City of Industry nor its planning director were consulted on the preparation of the EIR. We were consulted during the construction of the facilities in the City but had no input or knowledge about the review and processing of the system discussed in the EIR. Please remove the City from Section 6 of the EIR.

Brian James
Planning Director

City of Industry
15625 E. Stafford Street
Industry, CA 91744-0366
626-333-2211 | 626-961-6795 (F)
bdjames@cityofindustry.org
www.cityofindustry.org

Responses to Comment Letter LR-7

The Authority appreciates the City of Industry's comments on the Draft Environmental Impact Report (EIR) dated January 26, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Two facilities were found statutorily exempt and have already been constructed in the City of Industry. These are not addressed at all in the EIR, specifically section 1.3.2 and Table 1.3-1. These facilities should be accounted for in the LA-RICS system design and appear not to be.

Response to Comment 1: The Authority is not currently proposing or planning to construct any LMR sites in the City of Industry. However, the Authority has constructed one LA-RICS Long Term Evolution (LTE) site in the City. This is LTE Site LASDIDT, located at the Los Angeles County Sheriff's Industry Station at 150 N. Hudson Street in the City of Industry, which was constructed in 2015. The LTE and the LMR systems are two separate regional communications projects being carried out by the Authority. The LTE system is a wireless day-to-day broadband data communications system for use on a variety of platforms, including cellular smart phones, tablets, and other computers. The LMR system is also dedicated to public safety but is a wireless voice communications system for mobile and portable devices such as walkie-talkies and two-way radios. These independent projects are funded through different federal agencies through individual grant processes.

The Authority found LTE Site LASDIDT statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk's office on March 6, 2014. Therefore this site is identified in the list of statutorily exempt sites in Table 1.3.1 in the Draft EIR, and it is not described further or analyzed in the Draft EIR. LTE Site LASDIDT was also analyzed under NEPA in the Broadband Technology Opportunities Program (BTOP) Environmental Assessment (EA) dated October 2014, for which the National Telecommunications & Information Administration (NTIA) issued a Finding of No Significant Impact (FONSI) on July 10, 2015.

Comment 2: Neither the City of Industry nor its planning director were consulted on the preparation of the EIR. We were consulted during the construction of the facilities in the City but had no input or knowledge about the review and processing of the system discussed in the EIR. Please remove the City from Section 6 of the EIR.

Response to Comment 2: The Authority's environmental consultant, Jacobs Engineering, contacted Brian James, Planning Director for the City of Industry, via email on November 10, 2015 to request information about upcoming projects in the City for purposes of preparing the cumulative impacts analysis for the EIR. Mr. James provided a list of upcoming projects to the preparers of the EIR via return email on November 10, 2015. The projects on the list provided by the City of Industry were considered in the cumulative impact analysis conducted for the Draft EIR.



Comment Letter LR-8



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Kit Fox, AICP
Senior Administrative Analyst
City of Rancho Palos Verdes
30940 Hawthorne Boulevard
Rancho Palos Verdes, California 90275-5391

Dear Mr. Fox:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rancho Palos Verdes on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

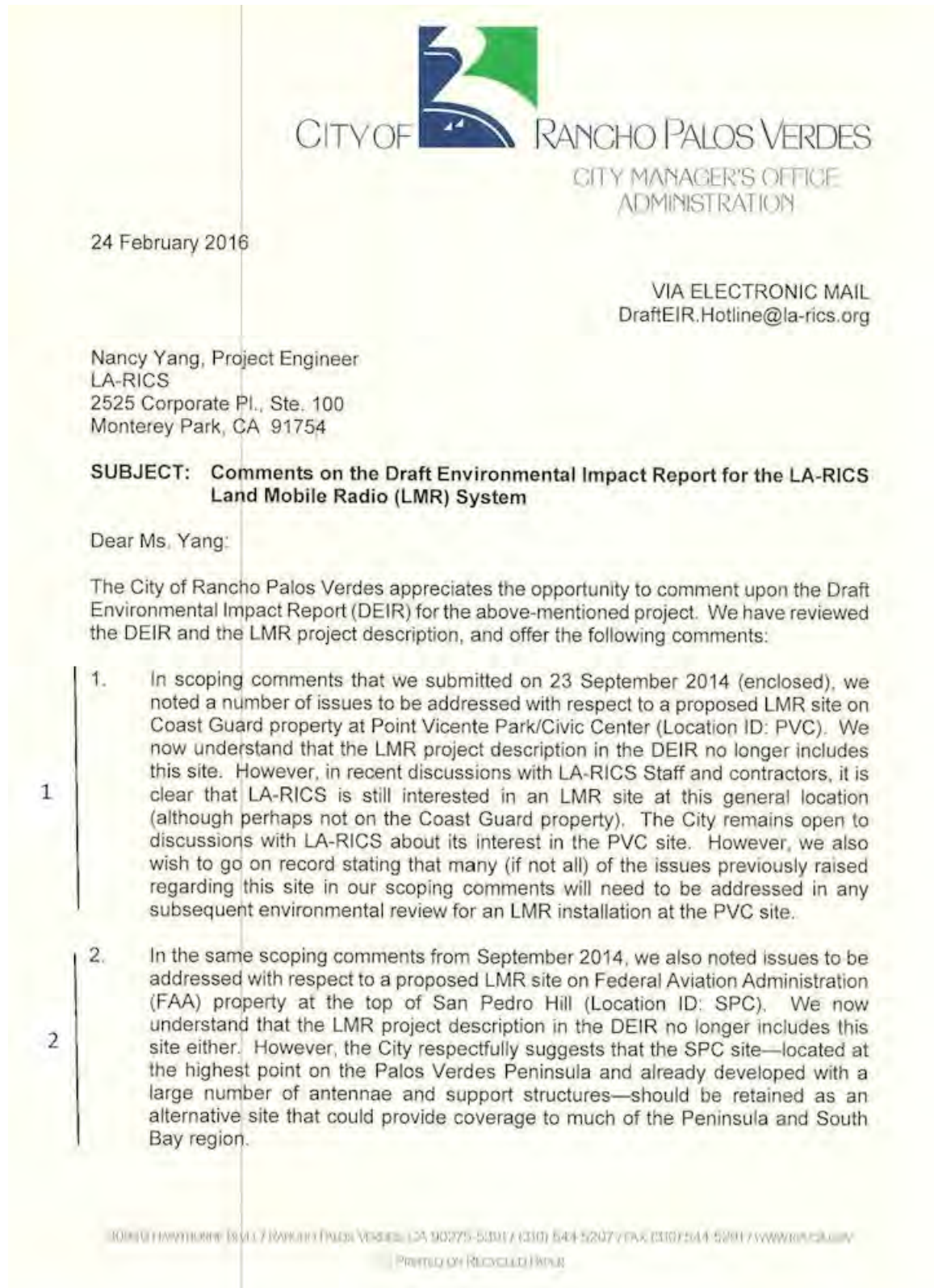
A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-8



24 February 2016

VIA ELECTRONIC MAIL
DraftEIR.Hotline@la-rics.org

Nancy Yang, Project Engineer
LA-RICS
2525 Corporate Pl., Ste. 100
Monterey Park, CA 91754

SUBJECT: Comments on the Draft Environmental Impact Report for the LA-RICS Land Mobile Radio (LMR) System

Dear Ms. Yang:

The City of Rancho Palos Verdes appreciates the opportunity to comment upon the Draft Environmental Impact Report (DEIR) for the above-mentioned project. We have reviewed the DEIR and the LMR project description, and offer the following comments:

- 1. In scoping comments that we submitted on 23 September 2014 (enclosed), we noted a number of issues to be addressed with respect to a proposed LMR site on Coast Guard property at Point Vicente Park/Civic Center (Location ID: PVC). We now understand that the LMR project description in the DEIR no longer includes this site. However, in recent discussions with LA-RICS Staff and contractors, it is clear that LA-RICS is still interested in an LMR site at this general location (although perhaps not on the Coast Guard property). The City remains open to discussions with LA-RICS about its interest in the PVC site. However, we also wish to go on record stating that many (if not all) of the issues previously raised regarding this site in our scoping comments will need to be addressed in any subsequent environmental review for an LMR installation at the PVC site.
- 2. In the same scoping comments from September 2014, we also noted issues to be addressed with respect to a proposed LMR site on Federal Aviation Administration (FAA) property at the top of San Pedro Hill (Location ID: SPC). We now understand that the LMR project description in the DEIR no longer includes this site either. However, the City respectfully suggests that the SPC site—located at the highest point on the Palos Verdes Peninsula and already developed with a large number of antennae and support structures—should be retained as an alternative site that could provide coverage to much of the Peninsula and South Bay region.



Comment Letter LR-8

Nancy Yang
24 February 2016
Page 2

- 3
3. In September 2014, we also noted concerns regarding a proposed LMR site at the County "antenna farm" at 5741 Crestridge Road (Location ID: RHT), primarily related to aesthetics, biological resource impacts, and land use and planning. We now understand that LA-RICS has determined that the RHT site is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code §21080.25, and will not be addressed in the DEIR. Notwithstanding this determination, the City believes that the issues raised in our scoping comments (enclosed) should be addressed before this LMR installation is constructed. Furthermore, we are concerned that the public outreach efforts undertaken by LA-RICS regarding the RHT site in December 2015 were inadequate. We have recently provided LA-RICS with addresses for several homes on Mistridge Drive and contact information for the *Mesa Palos Verdes* homeowners' association, all of whom should be apprised of LA-RICS' plans for the RHT site.

Again, thank you for the opportunity to comment upon this important project. If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at kitf@rpvca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kit Fox", is written over a light blue horizontal line.

Kit Fox, AICP
Senior Administrative Analyst

enclosure

cc: Mayor Ken Dyda and Rancho Palos Verdes City Council
Doug Willmore, City Manager
Gabriella Yap, Deputy City Manager
Terry Rodrigue, Interim Community Development Director
Ara Mihranian, Deputy Community Development Director

M:\Municipal Services\Emergency Communications\LA-RICS\20160224_Yang_DEIRComments.docx

Responses to Comment Letter LR-8

The Authority appreciates the City of Rancho Palos Verdes' comments on the Draft Environmental Impact Report (EIR) dated February 24, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: In scoping comments that we submitted on 23 September 2014 (enclosed), we noted a number of issues to be addressed with respect to a proposed LMR site on Coast Guard property at Point Vicente Park/Civic Center (Location ID: PVC). We now understand that the LMR project description in the DEIR no longer includes this site. However, in recent discussions with LA-RICS Staff and contractors, it is clear that LA-RICS is still interested in an LMR site at this general location (although perhaps not on the Coast Guard property). The City remains open to discussions with LA-RICS about its interest in the PVC site. However, we also wish to go on record stating that many (if not all) of the issues previously raised regarding this site in our scoping comments will need to be addressed in any subsequent environmental review for an LMR installation at the PVC site.

Response to Comment 1: Site PVC is no longer under consideration as part of the proposed project, and no replacement site has been proposed for inclusion in the LMR system. In the event a replacement site is identified, any approval of the site would be subject to CEQA, as applicable.

Comment 2: In the same scoping comments from September 2014, we also noted issues to be addressed with respect to a proposed LMR site on Federal Aviation Administration (FAA) property at the top of San Pedro Hill (Location ID: SPC). We now understand that the LMR project description in the DEIR no longer includes this site either. However, the City respectfully suggests that the SPC site - located at the highest point on the Palos Verdes Peninsula and already developed with a large number of antennae and support structures -should be retained as an alternative site that could provide coverage to much of the Peninsula and South Bay region.

Response to Comment 2: Site SPC is no longer in consideration as part of the proposed project, and no replacement site has been proposed for inclusion in the LMR system. The Authority notes the City's support for LMR facilities at Site SPC.

Comment 3: In September 2014, we also noted concerns regarding a proposed LMR site at the County "antenna farm" at 5741 Crestridge Road (Location ID: RHT), primarily related to aesthetics, biological resource impacts, and land use and planning. We now understand that LA-RICS has determined that the RHT site is statutorily exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code §21080.25, and will not be addressed in the DEIR. Notwithstanding this determination, the City believes that the issues raised in our scoping comments (enclosed) should be addressed before this LMR installation is constructed. Furthermore, we are concerned that the public outreach efforts undertaken by LA-RICS regarding the RHT site in December 2015 were inadequate. We have recently provided LA-RICS with addresses for several homes on Mistridge Drive and contact information for the *Mesa Palos Verdes* homeowners' association, all of whom should be apprised of LA-RICS' plans for the RHT site.

Response to Comment 3: As noted in the commenter's comments, Site RHT was found to be statutorily exempt from CEQA. Although statutorily exempt sites are not included in the project level analysis provided in the Draft EIR, numerous environmental criteria had to be met for a site to qualify for the statutory exemption, including criteria related to biological resources. Additionally, all of the statutorily



Responses to Comment Letter LR-8

exempt LMR sites are considered, where appropriate, in the cumulative impact analysis (see cumulative impacts analyses provided within resource topics in Chapters 2 and 3 of the Draft EIR). Because the Site RHT is exempt from analysis in the EIR, the Authority is not required to respond to the City's scoping comments on Site RHT. However, the comments will be provided to the Authority's decision makers for their consideration in connection with the LMR project, and the Authority will continue to work with stakeholders associated with Site RHT prior to and during construction and operations of the site.



Comment Letter LR-9



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Ms. Wendy Starks
Associate Planner
City of Rolling Hills
2 Portuguese Bend Road
Rolling Hills, California 90274

Dear Ms. Starks:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rolling Hills on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in blue ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-9

Joann Huerta

From: DraftEIR Hotline
Sent: Friday, February 12, 2016 9:48 AM
To: Joann Huerta; Beatriz Cojulun; Priscilla Lara; Wendy Stallworth-Tait
Subject: FW: LA-RICS Draft EIR

From: Wendy Starks
Sent: Friday, February 12, 2016 9:46:12 AM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Subject: LA-RICS Draft EIR

1 | I am reviewing the draft EIR for the LA-RICS project. I do not see the City of Rolling Hills listed as a potential site for location of a LMR facility and I want to confirm that The City of Rolling Hills is not being considered in the EIR as a potential site.

Thank you.
Wendy Starks

--

Wendy Starks, Associate Planner

City of Rolling Hills, 2 Portuguese Bend Road, Rolling Hills, CA 90274

310-377-1521 Fax: 310-377-7288 www.Rolling-Hills.org

This is a transmission from the City of Rolling Hills. The information contained in this email pertains to City business and is intended solely for the use of the individual or entity to whom it is addressed. If the reader of this message is not an intended recipient, or the employee or agent responsible for delivering the message to the intended recipient and you have received this message in error, please advise the sender by reply email and delete the message.

WARNING: Computer viruses can be transmitted by e-mail. The recipient should check this e-mail and any attachments for the presence of viruses. The CITY OF ROLLING HILLS accepts no liability for any damage caused by any virus transmitted by this e-mail.



Responses to Comment Letter LR-9

The Authority appreciates the City of Rolling Hills' comments on the Draft Environmental Impact Report (EIR) dated February 12, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I am reviewing the draft EIR for the LA-RICS project. I do not see the City of Rolling Hills listed as a potential site for location of a LMR facility and I want to confirm that The City of Rolling Hills is not being considered in the EIR as a potential site.

Response to Comment 1: The commenter is correct. No LMR sites have been identified in the Draft EIR for construction within the City of Rolling Hills, and the Authority is not currently proposing or planning to construct any LMR sites in the City of Rolling Hills.



Comment Letter LR-10



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. David Wahba, Director
Planning, Building and Safety, Zoning and Code Administration
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, California 90274

Dear Mr. Wahba:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Rolling Hills Estates on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment



Comment Letter LR-10

From: David Wahba [<mailto:davidw@ci.rolling-hills-estates.ca.us>]
Sent: Wednesday, January 13, 2016 11:01 AM
To: DraftEIR Hotline <DraftEIR.Hotline@LA-RICS.ORG>
Subject: Request for more info on the RHT site

Hi,

I am interested in what the facility will involve and look like at the RHT (Rolling Hills Transmit) site located at 5741 Crestridge Rd. in the City of RPV. I note that the EIR lists this site as Statutorily Exempt, so I presume the EIR is silent on this one??. I presume it is simply going on one of the existing antenna stands/towers given that this is already an antenna farm. Please advise.

Thanks,
David Wahba

David Wahba

Director of Planning, Building & Safety, Zoning and Code Administration | City of Rolling Hills Estates | 4045 Palos Verdes Drive North | Rolling Hills Estates | CA | 90274

310.377.1577 ext. 103 | 310.377.4468 (FAX) | davidW@RollingHillsEstatesCa.gov | www.RollingHillsEstatesCa.gov





Responses to Comment Letter LR-10

The Authority appreciates the City of Rolling Hills Estates' comments on the Draft Environmental Impact Report (EIR) dated January 13, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Comment 1: I am interested in what the facility will involve and look like at the RHT (Rolling Hills Transmit) site located at 5741 Crestridge Rd. in the City of RPV. I note that the EIR lists this site as Statutorily Exempt, so I presume the EIR is silent on this one??. I presume it is simply going on one of the existing antenna stands/towers given that this is already an antenna farm. Please advise.

Response to Comment 1: On November 13, 2014, the Authority found LMR Site RHT statutorily exempt from CEQA pursuant to Public Resources Code section 21080.25, and a Notice of Exemption was filed with the Los Angeles County Clerk's office on November 14, 2014. Therefore, this site is identified in the list of statutorily exempt LMR sites in Table 1.3.1 in the Draft EIR, and it is not described further or analyzed in the EIR. Current design for project implementation at Site RHT includes construction of a new, up to 180-foot lattice tower and related infrastructure and related site development including equipment shelter, emergency generator, and other site improvements.



Comment Letter LR-11



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY:
Overnight Delivery

March 11, 2016

Mr. Scott Charney, Director
Community Development Department
City of Signal Hill
2175 Cherry Avenue
Signal Hill, California 90755-3799

Dear Mr. Charney:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the City of Signal Hill on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-11



CITY OF SIGNAL HILL

2175 Cherry Avenue • Signal Hill, CA 90755-3799

February 25, 2016

VIA EMAIL: DraftEIR.Hotline@la-rics.org

Los Angeles
Regional Interoperable Communications System
Joint Powers Authority
Attn: Ms. Nancy Yang
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

RE: LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM
LAND MOBILE RADIO PROJECT DRAFT ENVIRONMENTAL IMPACT
REPORT

Dear Ms. Yang:

The City of Signal Hill has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Regional Interoperable Communications System (LA-RICS). The following is a summary of the City of Signal Hill's (the "City") comments related to the project.

Jurisdiction

The Land Mobile Radio tower proposed to be altered (the SGH tower) is located within the City of Signal Hill. The tower is both owned and operated by the City of Long Beach, a municipal corporation however, it is located on property that is jointly owned by GTE CALIFORNIA INC and THE CITY OF LONG BEACH.

Historically, Long Beach has been the permitting authority for the tower and the City of Long Beach has not contacted us to request, or authorize a shift in that permitting authority. Accordingly, the Long Beach tower does not have a CUP or similar entitlement from the City of Signal Hill.

Comment:

- A copy of the draft and final EIR should be distributed to the City of Long Beach's Department of Technology and Innovation.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 2

Alternative Sites for Signal Hill

2 | The location of the SGH tower is unique from other tower locations studied in the DEIR, in that it is surrounded by residentially zoned property and existing single-family and multi-family dwellings and also has a second antenna tower directly adjacent to it at 2411 Skyline Drive. No other sites appear to have existing residential uses directly adjacent on all sides.

Comments:

- 3 | • The DEIR for the SGH tower should analyze any hazards related to human health impacts and expected nuisances that could impact the adjacent residences and should include the cumulative impacts from the adjacent antenna tower.
- 4 | • The DEIR does not consider alternative site locations in lieu of the location identified for the SGH tower on Stanley Avenue.
- The City is requesting that LA-RICS conduct a due diligence investigation to identify alternative sites that are not in, or surrounded by any residential zoning districts.

Design

5 | The DEIR presents a “worst case scenario”, proposing the maximum number of necessary equipment to be installed at each site.

Comments:

- 6 | • Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill shall be provided with the design details for the SGH tower, including but not limited to the tower height, number, type and size of equipment (microwave antennas and whips) and diesel generator size and fuel tank storage size.
- 7 | • The impacts related to noise, construction impacts, area of disturbance and excavation shall also be disclosed.
- Upon receipt of the final LA-RICS tower design, LA-RICS shall coordinate with the City of Signal Hill to schedule and conduct a second a community meeting, in the City of Signal Hill to provide the community with information about the design.

Health Impacts from Radio Frequency Emissions

Comments:

- 8 | • Upon completion of the proposed design and prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Radio Frequency (RF) emission safety study, to demonstrate that the existing RF emission level from all equipment on site complies with the Federal Communications Commission (FCC) guidelines and regulations on Maximum Permissible Exposure for the General Public/Uncontrolled and for the Occupational/Controlled groups per the FCC’s Office of Engineering and Technology Bulletin 65.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 3

- 9 | • RF emission levels should be measured from the 20' level as well as from the ground, since the surrounding uses are two-story homes and should include the cumulative emissions from both the SGH tower and the adjacent antenna tower.
- 10 | • Prior to operation of any new equipment, the City of Signal Hill shall be provided with a copy of the report confirming that RF emission levels are in compliance with FCC regulations.
- 11 | • Confirmation that continued regular measurements of emissions will be conducted by certified professionals.

Compounded Radio Frequency Emissions
Comments:

- 12 | • All RF studies should be coordinated with the operator of the adjacent antenna tower at 2411 Skyline Drive, which is immediately adjacent to the subject site.
- 13 | • Specifically, the RF reports should study exposure rates for the General Public if both sites were at full capacity with antennas, whips and or other emitting equipment. A discussion on compounded RF Emissions is not included in the DEIR.
- 14 | • LA-RICS should include details of the procedures, equipment used, regularity, and methods of communicating the results of emissions monitoring before and after installation of equipment at the requested community meeting, or shall coordinate with the City of Signal Hill to conduct a third community meeting with these details.

Coverage Map & Interference

The DEIR does not include a map showing how the SGH tower will provide improved coverage and capacity to the immediate community.

Comments:

- 15 | • A map should be included within the DEIR showing improved coverage and identifying areas of concern where coverage would likely be lost during high emergency use.
- 16 | • The DEIR should discuss how interference issues will be addressed. Particularly, interference with frequencies used by residents for cable, radio, phone and or internet services.

Tower Location and Proximity to the Airport

Comment:

- 17 | • Prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Federal Aviation Administration determination of no hazard to air navigation letter or flight operations for any extension of the tower and/or lighting rod (per HAZ Mitigation Measure 2).

Fuel Tank and Proximity to Residential Dwellings

Comment:

- 18 | • Fuel tanks shall be installed in accordance with California Fire Code and applicable hazardous material storage ordinances.



Comment Letter LR-11

LA-RICS DEIR Comments
Page 4

- 19 |
- Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks adjacent to residential dwellings and active oil wells shall be implemented.
- 20 |
- If the tank is greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, a copy of the spill prevention, control and countermeasure plan shall be submitted to the City.

Construction

The City and community should be informed of what to expect during construction and excavation.

Comments:

- 21 |
- Contact information for the contractor and/or project manager should be provided to report any issues during construction.
- 22 |
- Prior to the start of any evening or weekend work, both the City and community should be notified in writing of construction activities expected to occur (between 6 p.m. and 7 a.m. or weekends).

Operations and Maintenance

Comments:

- 23 |
- The DEIR does not describe what noise mitigation there will be for the diesel motor and any other air conditioning, electrical equipment etc. to reduce operational noise to below the 55dBA (ambient noise required by the Signal Hill Municipal Code).
- 24 |
- The DEIR does not describe details for maintaining security at the SGH site.
- 25 |
- The DEIR does not describe annual RF emission reports that will be conducted to ensure that the tower is operating at a safe level as prescribed by the FCC. The City would like a copy of all annual RF emission reports.

Follow-Up Community Meeting Requested

Comment:

- 26 |
- Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill requests that the LA-RICS Authority hold at least one additional community meeting to provide the local community (including the Promontory/Skyline Estates Homeowners Association) with information about the final design, share the results of any studies and answer any questions requested in this letter.

Other Comments

- 27 |
- The following updates (shown with strikeouts for deletions and red text for additions) to the DEIR are requested for administrative purposes:



Comment Letter LR-11

LA-RICS DEIR Comments
Page 5

Project Description

Jurisdiction

Page 1-11

Local Agencies

- City of Long Beach

Page 2-18

Table 2.1-1

Site ID	Site Name	Street	City	Zip Code	Jurisdiction
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 4-1487

Jurisdiction: City of Long Beach

Landowner(s): GTE California Inc and Long Beach City

Page 4-1505

GEO-2 Discussion:

27

Construction plans would be reviewed by the City of Long Beach Signal Hill planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drain inlets.

Page 4-1514

Local Agency Jurisdiction: Long Beach Signal Hill

Zoning: Hilltop Area Specific Plan, Antenna and Microwave Consolidation/Park Site

Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.

3.12 Transportation/Traffic Page 3-516

Circulation Element, Scenic Routes – designates Skyline Drive, immediately south of the project site as a scenic route.

4.0 Chapter 4 Site Summary Forms

Page 4-1524

Nearest Solid Waste Disposal Facility: EDCO Disposal, 2755 California Ave, Signal Hill, CA 90755

Page 3-372

Table 3.7-4 Proposed Project Sites

Correct Address Section: Signal Hills



Comment Letter LR-11

LA-RICS DEIR Comments

Page 6

The City of Signal Hill recognizes the importance of a public communications system and looks forward to receiving the information requested in this letter. We appreciate that LA-RICS conducted a community meeting for interested residents and look forward to coordination of a second community meeting. Should you have any questions or comments regarding the comments please contact me at 562-989-7343 or scharney@cityofsignalhill.org. Please direct any response to comments to my attention and send a copy of the Final EIR.

Regards,

A handwritten signature in blue ink, appearing to read "Scott Charney", with a long, sweeping underline.

Scott Charney
Director of Community Development

cc: City Manager
Chief of Police

Responses to Comment Letter LR-11

The Authority appreciates the City of Signal Hill's comments on the Draft Environmental Impact Report (EIR) dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: The Land Mobile Radio tower proposed to be altered (the SGH tower) is located within the City of Signal Hill. The tower is both owned and operated by the City of Long Beach, a municipal corporation however, it is located on property that is jointly owned by GTE CALIFORNIA INC and THE CITY OF LONG BEACH.

Historically, Long Beach has been the permitting authority for the tower and the City of Long Beach has not contacted us to request, or authorize a shift in that permitting authority. Accordingly, the Long Beach tower does not have a CUP or similar entitlement from the City of Signal Hill.

Comment:

A copy of the draft and final EIR should be distributed to the City of Long Beach's Department of Technology and Innovation.

Response to Comment 1: The comment is noted

The Draft EIR is available on the Authority's website (www.la-rics.org). If the Authority certifies the Final EIR and approves the project, a Notice of Determination and the Final EIR will be filed with the Los Angeles County Clerk and the San Bernardino County Clerk. The Final EIR will also be posted on the Authority's website where it will be available to all interested parties, including the City of Long Beach. Permitting for the project will be undertaken by the Authority following certification of the EIR and project approval.

Comment 2: The location of the SGH tower is unique from other tower locations studied in the DEIR, in that it is surrounded by residentially zoned property and existing single-family and multi-family dwellings and also has a second antenna tower directly adjacent to it at 2411 Skyline Drive. No other sites appear to have existing residential uses directly adjacent on all sides.

Comments:

The DEIR for the SGH tower should analyze any hazards related to human health impacts and expected nuisances that could impact the adjacent residences and should include the cumulative impacts from the adjacent antenna tower.

Response to Comment 2: While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as SDW and WAD, are similar to site SGH in that they are located in residential areas with residences adjacent.

Draft EIR Section 3.7.4 – Impact Analysis for Hazards and Hazardous Materials, starting on page 3-382, under HAZ-1, HAZ-2 and HAZ-3, provides an analysis of significant hazards to the public (including residents) or environment for various hazards related to human health. Specific hazards for Site SGH are identified and discussed, beginning on page 4-1508. Hazards associated with transport of diesel fuel to the site would be reduced to a less than significant impact through implementation of regulations and

Responses to Comment Letter LR-11

requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination. The fuel tank within the generator would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Impacts from hazardous material transport and use on the site would be less than significant. The site is not within 0.25 mile of a school; therefore no impacts to schools would occur from diesel fuel use on the site.

Nuisances are not an environmental impact that require analysis under CEQA. However, the Draft EIR analyzes site-specific impacts from noise, starting on page 4-1516, and dust, starting on page 4-1531. Section 3.7.5, Cumulative Impacts, also provides an analysis of the potential impacts from identified hazards. This analysis considered potential impacts from adjacent antennas within the geographic boundary as defined in Section 3.7.5.1, as appropriate depending on the hazard and hazardous material discussed. Other potential cumulative impacts associated with adjacent antennas, such as aesthetics, are discussed in Section 3.1.4 starting on page 3-26.

Comment 3: The DEIR does not consider alternative site locations in lieu of the location identified for the SGH tower on Stanley Avenue.

Response to Comment 3: CEQA requires analysis of alternatives that would reduce or avoid significant effects of the proposed project. The Draft EIR did not identify any significant effects at Site SGH that cannot be mitigated by the mitigation measures identified in the Draft EIR. Therefore, CEQA does not require the Authority to identify an alternative to Site SGH. Additionally, the Authority explored numerous options for providing LMR coverage to the cities of Signal Hill and Long Beach area. The Authority conducted a candidate site search in the area to identify potential sites that provided coverage to areas that could not be covered by other planned sites. No other viable sites were identified that could provide LMR coverage equivalent to Site SGH. However, the Authority analyzed more sites in the Draft EIR than would ultimately be constructed, effectively analyzing numerous alternative sites.

Comment 4: The City is requesting that LA-RICS conduct a due diligence investigation to identify alternative sites that are not in, or surrounded by any residential zoning districts.

Response to Comment 4: Early and throughout the planning process, searches were conducted in the Los Angeles County area for sites suitable for inclusion in the LMR system. Alternative locations were identified and analyzed in the Draft EIR for many sites, when those alternatives were available. Examples of this include sites H-69B and SPN, where one served as an alternative to the other, and both were analyzed. For Site SGH, no suitable alternative location was identified for analysis.

Comment 5: The DEIR presents a "worst case scenario", proposing the maximum number of necessary equipment to be installed at each site.

Comments:

Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill shall be provided with the design details for the SGH tower, including but not limited to the tower height, number, type and size of equipment (microwave antennas and whips) and diesel generator size and fuel tank storage size.

Responses to Comment Letter LR-11

Response to Comment 5: The commenter is correct in that the Draft EIR provides a design scenario that allows for a conservative estimate of impacts using reasonable assumptions. The Authority will continue to work with the City of Signal Hill and will provide, as appropriate, information regarding tower and other site design details. No change to the Draft EIR is required as a result of this comment.

Comment 6: The impacts related to noise, construction impacts, area of disturbance and excavation shall also be disclosed.

Response to Comment 6: A complete site-specific impact analysis for Site SGH has been provided, beginning at page 4-1487 of the Draft EIR. The analysis for each resource is provided for both construction and operations activities. Impacts from construction activity are based on analysis that includes the area of disturbance and excavation activity as relevant to the resource topic. The analysis discusses the noise level estimated under a maximum construction activity scenario at proposed Site SGH to the nearest noise-sensitive receiver, which is 89 dBA within 25 feet of the site boundary. The actual construction noise level will not exceed this estimated level. Also discussed in the site-specific analysis, operational noise from the site would be within background levels.

Comment 7: Upon receipt of the final LA-RICS tower design, LA-RICS shall coordinate with the City of Signal Hill to schedule and conduct a second a community meeting, in the City of Signal Hill to provide the community with information about the design.

Response to Comment 7: Upon completion of design and prior to construction, the Authority will coordinate additional community meeting(s) and other outreach efforts with residents of the City of Signal Hill.

Comment 8: Upon completion of the proposed design and prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Radio Frequency (RF) emission safety study, to demonstrate that the existing RF emission level from all equipment on site complies with the Federal Communications Commission (FCC) guidelines and regulations on Maximum Permissible Exposure for the General Public/Uncontrolled and for the Occupational/Controlled groups per the FCC's Office of Engineering and Technology Bulletin 65.

Response to Comment 8: As described in Section 5.3 of the Draft EIR, the Authority will manage radiofrequency (RF) electromagnetic energy (EME) radiation in accordance with applicable guidance found at the Federal Communication Commission's Office of Engineering and Technology (OET) Bulletin 65. This will include desktop analysis of RF exposures inclusive of all equipment at the site (including new LMR equipment) prior to construction and confirmatory sampling of RF exposures upon completion of construction to ensure exposures are within regulatory requirements for workers and the public. This information will be provided when available to the City of Signal Hill.

Comment 9: RF emission levels should be measured from the 20' level as well as from the ground, since the surrounding uses are two-story homes and should include the cumulative emissions from both the SGH tower and the adjacent antenna tower.

Response to Comment 9: As noted in response to Comment 8, all RF exposure testing will be conducted in accordance with applicable guidelines, which include consideration of nearest receptors.

Responses to Comment Letter LR-11

Comment 10: Prior to operation of any new equipment, the City of Signal Hill shall be provided with a copy of the report confirming that RF emission levels are in compliance with FCC regulations.

Response to Comment 10: Testing for RF exposures will be conducted in accordance with OET Bulletin 65, as described in the response to comment 8. The Authority will provide the City with findings associated with both design-based desktop analyses and confirmatory sampling conducted upon completion of construction at Site SGH. As noted in Section 5.3 of the Draft EIR, RF EME will be managed in accordance with all applicable regulations.

Comment 11: Confirmation that continued regular measurements of emissions will be conducted by certified professionals.

Response to Comment 11: The Authority is responsible for management of RF EME as part of the FCC licensing process. Long term, the City of Long Beach manages the site. During our community outreach meeting held at Signal Hill on February 17, the City of Long Beach representative stated that they perform site RF EME testing every two years as part of overall site maintenance.

Comment 12: All RF studies should be coordinated with the operator of the adjacent antenna tower at 2411 Skyline Drive, which is immediately adjacent to the subject site.

Response to Comment 12: As noted in response to comment 8, the Authority will conduct all RF EME testing in accordance with FCC OET Bulletin 65.

Comment 13: Specifically, the RF reports should study exposure rates for the General Public if both sites were at full capacity with antennas, whips and or other emitting equipment. A discussion on compounded RF Emissions is not included in the DEIR.

Response to Comment 13: As noted in response to comment 8, the Authority will conduct all RF EME testing in accordance with FCC OET Bulletin 65.

Comment 14: LA-RICS should include details of the procedures, equipment used, regularity, and methods of communicating the results of emissions monitoring before and after installation of equipment at the requested community meeting, or shall coordinate with the City of Signal Hill to conduct a third community meeting with these details.

Response to Comment 14: The Authority will continue to work with the City and adjacent Homeowner's Association to disseminate factual information regarding site operations. We look forward to coordinating additional meeting(s) and additional outreach in the City of Signal Hill to accomplish this goal.

Comment 15: A map should be included within the DEIR showing improved coverage and identifying areas of concern where coverage would likely be lost during high emergency use.

Response to Comment 15: Coverage and capacity are not environmental issues that require a response pursuant to CEQA Guidelines Section 15088. Regardless, it is unlikely that coverage will suffer substantially during an emergency. Unlike long-term evolution (LTE) technology, LMR coverage propagation is relatively consistent by frequency, regardless of traffic.

Responses to Comment Letter LR-11

Comment 16: The DEIR should discuss how interference issues will be addressed. Particularly, interference with frequencies used by residents for cable, radio, phone and or internet services.

Response to Comment 16: Interference is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. Regardless, many of the spectrum bands listed will not be impacted by any of the frequencies being added. For other systems that exist on the tower, if there was evidence (as determined by FCC) that the Authority was causing interference, the Authority would be responsible for resolving the issue.

Comment 17: Prior to the issuance of building permits by the City of Long Beach, the City of Signal Hill requests a copy of the Federal Aviation Administration determination of no hazard to air navigation letter or flight operations for any extension of the tower and/or lighting rod (per HAZ Mitigation Measure 2).

Response to Comment 17: The Authority will continue to provide information to the City of Signal Hill.

Comment 18: Fuel tanks shall be installed in accordance with California Fire Code and applicable hazardous material storage ordinances.

Response to Comment 18: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 19: Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks adjacent to residential dwellings and active oil wells shall be implemented.

Response to Comment 19: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 20: If the tank is greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, a copy of the spill prevention, control and countermeasure plan shall be submitted to the City.

Response to Comment 20: Management of fuels will be conducted in accordance with all applicable regulations. This topic is described in Draft EIR Section 3.7 and specific detail is provided for Site SGH beginning at page 4-1508.

Comment 21: Contact information for the contractor and/or project manager should be provided to report any issues during construction.

Response to comment 21: Best management practices provided in Appendix C of the Draft EIR include the advance notification to surrounding land uses disclosing the construction schedule and construction activities. The notifications would include project contact information.

Responses to Comment Letter LR-11

Comment 22: Prior to the start of any evening or weekend work, both the City and community should be notified in writing of construction activities expected to occur (between 6 p.m. and 7 a.m. or weekends).

Response to Comment 22: Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the City of Signal Hill; however, it may be necessary for construction activities to take place outside these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work. In the event that is required, the Authority would work cooperatively with the City and make every effort to comply with the City's standards and regulations.

Comment 23: The DEIR does not describe what noise mitigation there will be for the diesel motor and any other air conditioning, electrical equipment etc. to reduce operational noise to below the 55dBA (ambient noise required by the Signal Hill Municipal Code).

Response to Comment 23: Per Chapter 9.16.060 of the Municipal Code, machinery and other equipment, including air conditioning units, generators, etc. operating for more than 5 minutes cannot exceed the ambient noise level at the property line. The daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) ambient noise level for residential areas prescribed in Chapter 9.16.020 of the Signal Hill Municipal Code are 60 dBA and 50 dBA, respectively. Table 3.10-2 of the Draft EIR will be revised to include this regulation. Draft EIR Section 3.10.4 describes a 52 dBA noise exposure within 10-feet of an operating air conditioning unit. The backup generator, which would be tested one-hour per month and otherwise operate on an emergency basis only, would be enclosed in a solid housing that will provide a minimum 10 dBA noise attenuation and result in a 58 dBA exposure at a distance of 21-feet or approximately 56 dBA at the property line (25-feet); however, the closest adjacent receiver to the SGH property line is separated by a 5-foot privacy wall that would provide an additional 5 dBA of noise mitigation and a net 51 dBA at the property line. Therefore, the operation of these pieces of equipment at proposed site SGH would not create more than a 5dBA increase above the ambient level including during nighttime hours. Chapter 4 of the Draft EIR will be revised in to include this additional information.

Comment 24: The DEIR does not describe details for maintaining security at the SGH site.

Response to Comment 24: Site security is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. Nevertheless, the Authority would install the proposed LMR equipment inside a secure compound, maintained by the City of Long Beach. There is no evidence of a need for any additional levels of security beyond what exists today.

Comment 25: The DEIR does not describe annual RF emission reports that will be conducted to ensure that the tower is operating at a safe level as prescribed by the FCC. The City would like a copy of all annual RF emission reports.

Response to Comment 25: The Authority understands that the City of Long Beach conducts testing at site SGH every two years as part of a regular maintenance program. The City of Signal Hill would need to work with the City of Long Beach to obtain any reports other than those directly associated with the LMR licensing effort (i.e., desktop analysis and post-construction confirmatory sampling required by OET Bulletin 65), which the Authority will provide as requested.



Responses to Comment Letter LR-11

Comment 26: Upon receipt of the final LA-RICS tower design and prior to the issuance of any building permits, the City of Signal Hill requests that the LA-RICS Authority hold at least one additional community meeting to provide the local community (including the Promontory/Skyline Estates Homeowners Association) with information about the final design, share the results of any studies and answer any questions requested in this letter.

Response to Comment 26: The request for a community meeting is not an environmental issue that requires a response pursuant to CEQA Guidelines Section 15088. However, upon completion of design and prior to construction, the Authority will coordinate additional community meeting(s) and other outreach efforts with residents of the City of Signal Hill.

Comment 27: Other Comments: The following updates (shown with strikeouts for deletions and red text for additions) to the DEIR are requested for administrative purposes:

Project Description
 Jurisdiction
 Page 1-11
Local Agencies
 • City of Long Beach

Page 2-18
 Table 2.1-1

Site ID	Site Name	Street	City	Zip Code	Jurisdiction
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 4-1487
 Jurisdiction: City of Long Beach
 Landowner(s): GTE California Inc and Long Beach City

Page 4-1505
GEO-2 Discussion:
 Construction plans would be reviewed by the City of Long Beach ~~Signal Hill~~ planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drain inlets.

Page 4-1514
 Local Agency Jurisdiction: Long Beach ~~Signal Hill~~
 Zoning: Hilltop Area Specific Plan, Antenna and Microwave Consolidation/Park Site
 Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.

3.12 Transportation/Traffic Page 3-516
 Circulation Element, Scenic Routes - designates Skyline Drive, immediately south of the project site as a scenic route.



Responses to Comment Letter LR-11

4.0 Chapter 4 Site Summary Forms

Page 4-1524

Nearest Solid Waste Disposal Facility: EDCO Disposal, 2755 California Ave, Signal Hill, CA 90755

Page 3-372

Table 3. 7-4 Proposed Project Sites

Correct Address Section: Signal Hills

Response to Comment 27: The requested changes will be made in the Final EIR. These revisions do not result in any change to the impact conclusions in the Draft EIR.



Comment Letter LR-12



**LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM AUTHORITY**

2525 Corporate Place, Suite 100
Monterey Park, California 91754
Telephone: (323) 881-8291
<http://www.la-rics.org>

JOHN RADELEFF
INTERIM EXECUTIVE DIRECTOR

SENT CORRESPONDENCE BY
Overnight Delivery

March 11, 2016

Jillian Wong, PhD
Program Supervisor
Planning, Rule Development and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4178

Dear Dr. Wong:

**RESPONSE TO COMMENT LETTER ON THE DRAFT ENVIRONMENTAL IMPACT
REPORT (EIR) FOR THE LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS) JOINT POWERS AUTHORITY
(AUTHORITY) LAND MOBILE RADIO (LMR) PROJECT**

The LA-RICS Authority appreciates the comments provided by the South Coast Air Quality Management District on the Draft EIR for the proposed LMR Project. Proposed responses to these comments are provided herein in compliance with Section 15088(b) of the State California Environmental Quality (CEQA) Guidelines. All comments will be provided to the LA-RICS Authority Board prior to their consideration of the EIR for certification. The proposed time, date, and location of the hearing to consider certification of the Final EIR and approval of the proposed project will be provided on the Authority's website (www.la-rics.org).

Sincerely,

A handwritten signature in black ink that reads "Susy Orellana-Curtiss".

Susy Orellana-Curtiss
Administrative Deputy

Attachment

Comment Letter LR-12



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS:
DraftEIR.Hotline@la-rics.org

February 19, 2016

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
2525 Corporate Place, Suite 100
Monterey Park, CA 91754

Draft Environmental Impact Report (Draft EIR) for the Land Mobile Radio (LMR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document both as a commenting agency and a responsible agency. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

The Lead Agency proposes the construction/installation of a wireless communications system. The LMR system would consist of antennas and support equipment at up to 90 sites. LMR antennas would be installed on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures. Diesel backup generators will be installed at all sites. Since the proposed project includes diesel-fueled generators which are rated greater than 50 brake horsepower (bhp), a permit would be required in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and Rule 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. If you have any questions regarding this letter, please contact me at jcheng@aqmd.gov or call me at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

LAC160113-01
Control Number



Responses to Comment Letter LR-12

The Authority appreciates the South Coast Air Quality Management District's comments on the Draft Environmental Impact Report (EIR) dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to comments are provided below.

Comment 1: The Lead Agency proposes the construction/installation of a wireless communications system. The LMR system would consist of antennas and support equipment at up to 90 sites. LMR antennas would be installed on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures. Diesel backup generators will be installed at all sites. Since the proposed project includes diesel-fueled generators which are rated greater than 50 brake horsepower (bhp), a permit would be required in accordance with SCAQMD rules including Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and Rule 1110.2 – Emissions From Gaseous- and Liquid-Fueled Engines. If there are permit questions concerning the generator, they can be directed to Engineering and Compliance Staff at (909) 396-2315.

Response to Comment 1: A discussion of the South Coast Air Quality Management District Rule 1470 permitting requirements will be added to the Final EIR in Section 3.2.2.3 *Local Regulatory Setting*. The Draft EIR assumes that operation of backup generators will comply with District Rule 1110.2. Additional discussion of District Rule 1110.2 to evaluate the significance of project impacts under CEQA is not necessary.

Comment Letter NGO 1



[Via Email \(DraftEIR.Hotline@la-rics.org\)](mailto:DraftEIR.Hotline@la-rics.org)

February 20, 2016

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
c/o Nancy Yang
2525 Corporate Place, Suite 100
Monterey Park CA 91754

RE: Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) Project; SCH #2014081025

Dear LA-RICS Board:

I am the First Vice President of Brentwood Hills Homeowners Association (Brentwood Hills), and am writing on behalf of Brentwood Hills in response to the Notice of Availability dated January 11, 2016. That Notice requests comments regarding the Draft Environmental Impact Report (DEIR) circulated under the California Environmental Quality Act (CEQA), and requests comments be submitted by February 25, 2016.

Brentwood Hills represents over 450 homes in the Santa Monica Mountains above Mandeville Canyon Road north of Sunset Blvd in the Brentwood region of Los Angeles. Brentwood Hills is located adjacent to Topanga State Park, the Westridge-Canyonback Wilderness Park, Temescal Park and the Santa Monica National Recreation Area. Brentwood Hills has been instrumental in protecting open space, public access and parklands in the Santa Monica Mountains.

1 Brentwood Hills has serious concerns with the DEIR, which does not comply with either the letter or the spirit of CEQA in terms of its environmental analysis of the 180 foot-tall lattice LMR towers proposed for numerous locations in the Santa Monica Mountains, including locations within, adjacent to, or surrounded by the Santa Monica Mountains National Recreation Area and Topanga State Park. Many of these proposed locations are on significant ridgelines, within the Coastal Zone, and near scenic highways and corridors. Yet the DEIR dismisses the significant environmental impacts of these locations by noting that there is some development at the sites, or claiming that existing small towers located on those sites mean that there will be no significant impacts from the construction of the much larger 180 foot-tall lattice towers proposed for these sites, with their many antennas, dishes, lightning rods and flashing lights— not to mention the necessary power structures, associated equipment and grading activities.

2 For example, the 180 foot-tall lattice tower proposed for the Green Mountain location (GRM) above the popular Temescal Ridge and Waterfall Trail in Temescal Park is much larger than the existing 50



Comment Letter NGO 1

LA-RICS
February 20, 2016

2 foot monopole antenna, both in terms of the height and breadth of the proposed tower, as well as the
visual disruption to the many hiking trails in Topanga State Park and Temescal Park. And the
environmental disruption associated with the necessary grading of the large pad required to support
the associated power and communications equipment makes matters even worse. Similarly, the 180
3 foot-tall lattice tower proposed for Topanga Peak (TOP) is materially larger and more disruptive
than the two existing 26 foot-tall monopole antennas currently located at the site. And many of the
other sites proposed within the Santa Monica Mountains Recreation Area do not have any antennas
at all. Yet the DEIR notes in a cursory fashion that because there is some development or small
towers at these sites, there will be no significant impacts from building the huge 180 foot-tall lattice
towers at the sites. This does not comply with CEQA. The significant impacts of the huge towers
proposed by LA-RICS within the Santa Monica Mountains are not properly analyzed in the DEIR,
and the DEIR should be revised and recirculated.

4 In addition, the DEIR completely fails to analyze the required “no project” alternative for the
specific tower locations in the Santa Monica Mountains. Instead, the DEIR defines the “no project
alternative” to be the construction of no LA-RICS system at any location at all. Not surprisingly, the
DEIR rejects that alternative in a cursory manner as not meeting project objectives. But CEQA
requires much more than that, including a meaningful analysis of the no project alternative at each
proposed tower location within the Santa Monica Mountains. For example, if the proposed 180 foot-
tall lattice tower at Green Mountain is not constructed, how will the LA-RICS system be affected?
Are there other locations that will provide similar coverage and benefits to the system, with fewer
environmental impacts? The public and the decision-makers will never know because those issues
are not analyzed in the DEIR.

5 Nor does the DEIR analyze any alternative tower heights or antenna configurations at those
locations, as CEQA requires. At the public meeting held in Culver City, the LA-RICS
representatives told me they believe that, as long as they analyze the largest tower configuration
possible for the Santa Monica Mountain sites, CEQA will be satisfied, because LA-RICS decision-
makers could later decide to construct a smaller tower, different antenna configurations or even
delete the location when it comes time to actually build the project. But how will members of the
public, affected agencies and even the LA-RICS decision-makers themselves know what the least
impactful, most environmentally sensitive configuration is if the DEIR ignores any such analysis?
CEQA requires a meaningful and thorough analysis of all alternatives, including alternative locations
and tower configurations for each tower location proposed to be located within environmentally
sensitive parklands, on significant ridgelines, within the Coastal Zone and near scenic highways and
corridors.

6 The DEIR also fails to properly analyze the environmental impacts of the proposed towers on the
visual, aesthetic, biological, parkland and ecological resources.

7 Brentwood Hills and many other community organizations feel strongly that the Santa Monica
Mountains National Recreation Area, Topanga State Park, and Temescal Park are inappropriate
locations for the huge 180 foot-tall LMR towers that LA-RICS is proposing for those sites.



Comment Letter NGO 1

LA-RICS
February 20, 2016

8 | Brentwood Hills urges that the DEIR be amended and recirculated to fully analyze both the “no project alternative” and alternative locations and tower configurations for each location within the Santa Monica Mountains where LA-RICS is proposing a 180 foot-tall lattice tower in the DEIR.

9 | Brentwood Hills agrees with the DEIR that the towers proposed for the H-69B and LACPCP08 sites pose significant and unavoidable environmental impacts, and we urge those sites to be deleted from consideration. Brentwood Hills also believes that the Green Mountain (GRM) and Topanga Peak (TOP) sites, if they were properly analyzed as required by CEQA, would also pose significant and unavoidable impacts. We urge those sites as well to be deleted from consideration.

10 | Brentwood Hills hereby incorporates all comments on the DEIR received by other community groups and public agencies, and requests that it be placed on the email and mailing notice lists for all public meetings, notices, letters and environmental reports concerning this project. Please email Brentwood Hills at leslie@caldwell-leslie.com.

We look forward to your thoughtful consideration of the community’s substantial concerns regarding these towers.

Sincerely,

A handwritten signature in blue ink that reads "Michael R. Leslie".

MICHAEL R. LESLIE,
First Vice President, Brentwood Hills Homeowners Association

Cc (via email):

Supervisor Sheila Kuehl, County of Los Angeles
State Senator Fran Pavley
State Assemblyman Richard Bloom
State Assemblyman Matt Dababneh
State Senator Ben Allen
Santa Monica Mountains Conservancy
National Park Service
Hillside Federation
Interested community groups and homeowners associations



Responses to Comment Letter NGO 1

The Authority appreciates the Brentwood Hills Homeowners Association’s comments on the Draft EIR dated February 20, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Brentwood Hills has serious concerns with the DEIR, which does not comply with either the letter or the spirit of CEQA in terms of its environmental analysis of the 180 foot-tall lattice LMR towers proposed for numerous locations in the Santa Monica Mountains, including locations within, adjacent to, or surrounded by the Santa Monica Mountains National Recreation Area and Topanga State Park. Many of these proposed locations are on significant ridgelines, within the Coastal Zone, and near scenic highways and corridors. Yet the DEIR dismisses the significant environmental impacts of these locations by noting that there is some development at the sites, or claiming existing small towers located on those sites mean that there will be no significant impacts from the construction of the much larger 180 foot-tall lattice towers proposed for these sites, with their many antennas, dishes, lightning rods and flashing lights – not to mention the necessary power structures, associated equipment and grading activities.

Response to Comment 1: The EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively. A detailed description of activities associated with the construction and operation of the project is provided in Chapter 2 of the Draft EIR. Specifically, sections 2.1.2.1 (Project Site Components) and 2.1.2.2 (Project Site Types) discuss in detail what was considered in the impacts analysis. Section 2.1.2.1 specifically addresses “antennas”, “equipment shelters”, “emergency generators”, “grounding”, “cable raceway”, “utilities”, and “lighting”. Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project are discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance.

The Draft EIR identifies and fully analyzes impacts at each of the 54 sites evaluated for each of the 13 environmental resource areas as discussed in Chapter 3 and Chapter 4 of the Draft EIR. Pursuant to CEQA, a significance determination was made for each impact at each site as described in Chapter 4, aggregated in Chapter 3, and summarized in the executive summary (in particular Table ES-1 and Table ES-2) of the Draft EIR.

The Draft EIR includes information that 12 of the 54 sites analyzed are located within or adjacent to the Santa Monica Mountains National Recreation Area and/or Topanga State Park. These are sites CPK



(discussed at Draft EIR, page 4-296)¹, ENC1 (page 4-372), ENT (page 4-411), GRM (page 4-566), H-69B (page 4-643), LACF072 (page 4-799), LACFCP08 (page 4-837), LEPS (page 4-989), PWT (page 4-1371), SPN (page 4-1563), TOP (page 4-1722), ZHQ (page 4-2026). Of these 12 sites, two sites (LACFCP08 and PWT) are on land administered by the National Park Service, and one site (site GRM) is located on land administered by the California Department of Parks and Recreation in Topanga State Park.

The Draft EIR analysis also considers that:

- Six of these 12 sites (sites CPK, ENT, H-69B, LACFCP08, SPN, and TOP) were identified on significant ridgelines.
- Eight of these 12 sites (sites CPK, ENC1, GRM, LACF072, LACFCP08, PWT, SPN, TOP) are in the coastal zone.
- Nine of these 12 sites (sites CPK, ENC1, ENT, H-69B, LACF072, LACFCP08, PWT, SPN, and TOP) are adjacent to a scenic highway or regional trail.

Of the 12 sites identified above, existing communication support structures occur at sites CPK, GRM, SPN, TOP, and ZHQ. Because these sites already contain communication support structures which are a part of the existing viewshed, it was determined that the addition of a proposed new structure would result in an added visual intrusion to the area, but would not block or remove views, and therefore the visual impacts would not be significant.

Of the seven other sites in the Santa Monica Mountains National Recreation Area and/or Topanga State Park:

Site ENC1 is situated in an existing fire camp, amongst topography and tall vegetation that were determined to obscure the view of the proposed 180-foot tower and associated infrastructure, and aesthetic impacts were determined to be less than significant.

Site ENT includes existing large water towers. While the proposed 70-foot monopole and associated infrastructure would be visible from above, it would not result in a substantial adverse effect on any scenic vista, and aesthetic impacts were determined to be less than significant.

Site LACF072 is an existing fire station that is somewhat developed, containing tall vegetation. Views of the site from Decker Canyon Road are obscured by the cut banks along the roadway, which is lined by telephone/power poles. The site would not interfere with scenic vistas therefore impacts on scenic vistas were determined to be less than significant.

Site LACFCP08 is a developed fire station in an area that has been highly disturbed and is not easily visible from readily accessible viewpoints. The proposed new 70-foot monopole and associated infrastructure would not block or remove views, nor create a substantial impact on a scenic vista. Impacts to aesthetics were determined to be less than significant.

¹ Unless otherwise noted, all page numbers refer to pages in the Draft EIR that contain relevant site-specific analysis, which is incorporated by reference herein.



Site LEPS includes a water tank, that is not currently visible from Encinal Canyon Road. The proposed 70 foot monopole and associated infrastructure would be visible, but the greatly varying topography would help to obscure the monopole from some locations. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Aesthetic impacts were determined to be less than significant.

Site PWT is adjacent to an existing water tank, and the proposed 28-foot monopole and associated infrastructure would not exceed the height of this existing infrastructure. Scenic views would not be substantially impacted, and aesthetic impacts would be less than significant.

Site H-69B is already highly disturbed, but the site is located on a scenic route on a significant ridgeline that contains no current infrastructure. Views would be substantially altered, since no infrastructure is present. As a result, the Draft EIR determined that aesthetic impacts at the site would be significant. The only potential mitigation measure for this impact would be to paint the structure. However, this mitigation is infeasible as FAA standards would dictate any painting or camouflaging activities associated with the proposed 180-foot tower for aviation safety purposes. Impacts were determined to be significant and unavoidable at this site.

The comment does not provide any evidence that would result in any revisions to the Draft EIR's conclusions.

Comment 2: For example, the 180 foot-tall lattice tower proposed for the Green Mountain location (GRM) above the popular Temescal Ridge and Waterfall Trail in Temescal Park is much larger than the existing 50 foot monopole antenna, both in terms of the height and breadth of the proposed tower, as well as the visual disruption to the many hiking trails in Topanga State Park and Temescal Park. And the environmental disruption associated with the necessary grading of the large pad required to support the associated power and communications equipment makes matters even worse.

Response to Comment 2: The site specific description and impact analysis for site GRM beginning at page 4-568 of the Draft EIR considered, among other factors, the bulk and scale of the existing built landscape of the site and the site's location within Topanga State Park along the heavily traveled Temescal Ridge Trail Road. At site GRM, the Draft EIR determined that hikers on the Temescal Ridge Trail would be the viewers most likely affected by construction of GRM. Due to the isolated nature of this site, it is not readily visible from vantage points other than the trail. Views of nature from the trail are currently intruded upon by existing human-made linear structures, such as power poles and powerlines, as well as intermittent views of the existing structures on the proposed site. As discussed on page 4-569 of the Draft EIR:

“Primary sensitive viewers include hikers on the ‘heavily traveled’ Temescal Ridge Trail, which ‘begins with a 1,000-foot ascent that gives way to panoramic ocean-and-city views, then descends into a sycamore-shaded canyon to a seasonal waterfall’ (trails.com 2014).”



Visual impacts were evaluated according to CEQA criteria as discussed in Chapters 3.0 and 4.0 of the Draft EIR. The aesthetic analysis considered several factors to determine visual sensitivity, visual changes, and visual impacts of each site, as summarized in the methodologies discussed in Section 3.1.1 of the Draft EIR. As noted in Section 3.1.4 of the Draft EIR, the analysis considered, among many other factors, the visual character of each site based the relationships between the existing visible natural and built landscape features of each site, the dominance, scale, diversity, and continuity of each site’s visual environment, as well as the height, bulk, and scale of existing site uses. Open spaces (such as parks and undeveloped land) and significant viewpoints and scenic viewers were also considered in the analysis. Section 3.1.4 of the Draft EIR notes that the sensitivity of existing visual resources is influenced by whether the visual resource is common or rare within the study area; whether it is considered to be of local, regional, national, or global importance, the quality of the resource; public awareness and tolerance of adverse visual change; and the ability of the resource to accommodate change.

Based on the methodology in Section 3.1.4, the impact analysis in the Draft EIR shows that construction would result in less than significant impacts on aesthetics at site GRM.

The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site.

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

The commenter does not provide any new information or specific concerns related to the methodology, developed by the Authority’s aesthetics expert, utilized in the Draft EIR that would require the Authority to reconsider methodology or impact analysis at site GRM or any other site.

Other impacts resulting from grading, trenching, foundation excavation, construction, provision of power and communications lines, and other activities at site GRM were fully analyzed in the Draft EIR, as provided in the site specific analysis provided in Chapter 4 of the Draft EIR beginning on page 4-568.

Comment 3: Similarly, the 180 foot-tall lattice tower proposed for Topanga Peak (TOP) is materially larger and more disruptive than the two existing 26 foot-tall monopole antennas currently located at the site. And many of the other sites proposed within the Santa Monica Mountains Recreation Area do not have any antennas at all. Yet the DEIR notes in a cursory fashion that because these is some development or small towers, there will be no significant impacts from building the huge 180 foot-tall lattice towers at the sites. This does not comply with CEQA. The significant impacts of the huge towers proposed by LA-RICS within the Santa Monica Mountains are not properly analyzed in the DEIR, and the DEIR should be revised and recirculated.

Response to Comment 3: The visual impact analysis for site TOP considered the same factors as those considered for site GRM and all the other proposed sites, summarized above. Chapter 4.0 of the Draft EIR notes that site TOP is located on a significant ridgeline and includes existing infrastructure such as a microwave dish and whip antennas mounted to monopoles, as well as a water tank and small one-story building. A large radio relay tower is immediately adjacent to the site to the east. The existing radio tower is tall and very broad, and is an extremely prominent feature on the ridgeline (see photo below). The analysis notes that both the monopoles and radio tower are clearly visible from segments of east- and west-bound traffic on Saddle Peak Road. The Backbone Trail passes between the site and Saddle Peak Road, and a trailhead and pullout exist on the road just east of the site. The view is dominated by the ridgeline, the roadway corridor, and the radio tower.





Due to the area’s extensively rolling topography, views of the existing site are limited and intermittent. Similar to site GRM, Chapter 4.0 notes that the proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes a large, bulky radio tower and two shorter, slim monopoles that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that only a small area of the scenic vista is altered. The existing visual character and quality of the site and its surroundings are impacted by the presence of the existing towers. Although the proposed lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, this new infrastructure would be compatible with the existing site. There would be no substantial adverse change to the visual character or quality of the significant ridgeline or the Backbone Trail. In short, the proposed project would result in visual changes; however, the visual changes would result in a less than significant visual impact.

Regarding this comment, no new information or specific concerns were raised by the reviewer related to the methodology or impact analysis used for site TOP that would cause the Authority to reconsider the impact analysis presented in the Draft EIR.

Comment 4: In addition, the DEIR completely fails to analyze the required “no project” alternative for the specific tower locations in the Santa Monica Mountains. Instead, the DEIR defines the “no project alternative” to be the construction of no LA-RICS system at any location at all. Not surprisingly, the DEIR rejects that alternative in a cursory manner as not meeting project objectives. But CEQA requires much more than that, including a meaningful analysis of the no project alternative at each proposed tower location within the Santa Monica Mountains. For example, if the proposed 180 foot-tall lattice tower at Green Mountain is not constructed, how will the LA-RICS system be affected? Are there other locations that will provide similar coverage and benefits to the system, with fewer environmental impacts? The public and the decision-makers will never know because those issues are not analyzed in the DEIR.

Response to Comment 4: The Draft EIR defines the No Project Alternative as a scenario in which none of 54 sites considered within the Draft EIR would be constructed in compliance with CEQA Guidelines section 15126.6(e)(3)(B), which states that when the proposed project is a development project on identifiable property, the “no project” alternative is the scenario under which the project does not proceed.

Not constructing one or more of the individual towers proposed would not represent the “no project” alternative as defined in CEQA, and would result in a failure to meet the project objectives set forth in Draft EIR section 2.2 in the geographic location served by that site. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders



- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications
- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements
- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains National Recreation Area and Topanga State Park provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains National Recreation Area and Topanga State Park substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design. Ultimately the system design will seek to maximize Project Objectives discussed in Draft EIR Section 2.2.

Comment 5: Nor does the DEIR analyze any alternative tower heights or antenna configurations at those locations, as CEQA requires. At the public meeting held in Culver City, the LA-RICS representative told me they believe that, as long as they analyze the largest tower configuration possible for the Santa Monica Mountain sites, CEQA will be satisfied, because LA-RICS decision-makers could later decide to construct a smaller tower, different antenna configurations or even delete the location when it comes time to actually build the project. But how will members of the public, affected agencies and even the LA-RICS decision-makers themselves know what the least impactful, most environmentally sensitive configuration is if the DEIR ignores any such analysis? CEQA requires meaningful and thorough analysis of all alternatives, including alternative locations and tower configurations for each tower location proposed to be located within environmentally sensitive parklands, on significant ridgelines, within the Coastal Zone and near scenic highways and corridors.

Response to Comment 5: Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some of these site would be constructed nearly exactly as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

The analysis conducted in Chapter 2 of the Draft EIR; Sections 2.1.2.1 Project Site Components and 2.1.2.2 Project Site Types provides the best design information currently available for the project.



Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project is discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance. Associated impacts are analyzed in Chapters 3 and Chapter 4 of the Draft EIR.

Comment 6: The DEIR also fails to properly analyze the environmental impacts of the proposed towers on the visual, aesthetics, biological, parkland, and ecological resources.

Response to Comment 6: The Draft EIR fully analyzed environmental impacts of the proposed towers on visual, aesthetics, biological, parkland and ecological resources. Site specific analysis for each of the 54 sites in the Draft EIR is provided in Chapter 4 and is summarized, as applicable in Chapter 3; Specifically, Section 3.1 (“visual” and “aesthetics”), Section 3.3 (“biological” and “ecological resources”) and Sections 3.9 and 3.11 (“parkland”). The Draft EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively.

Comment 7: Brentwood Hills and many other community organizations feel strongly that the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park are inappropriate locations for the huge 180 foot-tall LMR towers that LA-RICS is proposing for those sites.

Response to Comment 7: The project site locations have been selected to maximize coverage to enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists. Your opposition to the project locations within the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park is noted, is included in the record of proceedings, and will be considered by the Authority’s decision makers in connection with their consideration of the proposed project.

Comment 8: Brentwood Hills urges that the DEIR be amended and recirculated to fully analyze both the “no project alternative” and alternative locations and tower configurations for each location within the Santa Monica Mountains where LA-RICS is proposing a 180 foot-tall lattice tower in the DEIR.

Response to Comment 8: Please see response to Comment 4 and 5 above for a discussion of how the EIR’s analysis of alternatives complies with CEQA. The project locations within the Santa Monica Mountains, regardless of the project site type, are critical to the design of the system to provide county-wide coverage. These sites provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The commenter does not specifically identify alternative locations for consideration within the Santa Monica Mountains.



Nothing in the comments or the Authority’s responses to these comments is “significant new information” as that term is defined in CEQA guidelines section 15088.5, and recirculation of the Draft EIR is not required.

Comment 9: Brentwood Hills agrees with the DEIR that the towers proposed for the H-69B and LACPCP08 sites pose significant and unavoidable environmental impacts, and we urge those sites to be deleted from consideration. Brentwood Hills also believes that the Green Mountain (GRM) and Topanga Peak (TOP) sites, if they were properly analyzed as required by CEQA, would also pose significant and unavoidable impacts. We urge those sites as well to be deleted from consideration.

Response to Comment 9: As discussed in response to the comments above, and as stated in the Draft EIR, no significant and unavoidable impacts were found for sites GRM or TOP. (See DEIR pp. 4-566 through 4-603 (GRM) and pp. 4-1722 through 4-1761 (TOP).) The comment letter does not provide any evidence that would require a revision to these conclusions in the EIR. The request that these sites be deleted from consideration will be considered by the Authority’s decision makers in connection with the proposed project.

Comment 10: Brentwood Hills hereby incorporates all comments on the DEIR received by other community groups and public agencies, and requests that it be placed on the email and mailing notice lists for all public meetings, notices, letters and environmental reports concerning this project. Please email Brentwood Hills at leslie@caldwell-leslie.com.

Response to Comment 10: The Authority acknowledges the incorporation of other comments into this comment letter. In response, the Authority incorporates its responses to those comments by reference.



Comment Letter NGO 2

P.O. Box 27404
 Los Angeles, CA 90027
www.hillsidefederation.org



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 John Givan
 TREASURER
 Doni Andras

Via Email (DraftEIR.Hotline@la-rics.org)

Los Angeles Regional Interoperable Communications System
 Joint Powers Authority
 c/o Nancy Yang
 2525 Corporate Place, Suite 100
 Monterey Park, CA 91754

February 25, 2016

Re: ***Los Angeles Regional Interoperable Communications System (LA-RICS)
 Land Mobile Radio (LMR) Project; SCH #2014081025***

- Beechwood Canyon Neighborhood
- Bel-Air Association
- Bel Air Knolls Property Owners
- Bel Air Skycrest Property Owners
- Benedict Canyon Association
- Brentwood Hills Homeowners
- Brentwood Residents Coalition
- Cahuenga Pass Property Owners
- Canyon Back Alliance
- OASM-SFV
- Crests Neighborhood Assn.
- Franklin Ave./Hollywood Bl. West
- Franklin Hills Residents Assn.
- Highlands Owners Assn.
- Hollywood Dell Civic Assn.
- Hollywood Heights Assn.
- Hollywoodland Homeowners
- Holmby Hills Homeowners Assn.
- Kagle Canyon Civic Assn.
- Lake Hollywood HOA
- Laurel Canyon Assn.
- Lookout Mountain Alliance
- Los Feliz Improvement Assn.
- Mt. Olympus Property Owners
- Mt. Washington Homeowners Assn.
- Nichols Canyon Assn.
- N. Beverly Dr./Franklin Canyon
- Oak Forest Canyon Assn.
- Oaks Homeowners Assn.
- Outpost Estates Homeowners
- Rancho Verdugo Estates
- Residents of Beverly Glen
- Rossmore Valley Assn.
- Save Coldwater Canyon!
- Save Sunset Blvd
- Shadow Hills Property Owners
- Sherman Oaks HO Assn.
- Silver Lake Heritage Trust
- Studio City Residents Assn.
- Sunset Hills Homeowners Assn.
- Tarzania Property Owners Assn.
- Torreyson Flynn Assn.
- Upper Mandeville Canyon
- Upper Nichols Canyon NA
- Whitley Heights Civic Assn.

Dear LA-RICS Board:

The Federation of Hillside and Canyon Associations, Inc., founded in 1952, represents 45 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains. Thank you for the opportunity to provide public comment on the Draft Environmental Impact Report (DEIR) for the above-captioned project.

The Federation is aware of a DEIR comment letter submitted by our member organization, Brentwood Hills Homeowners Association, dated February 20, 2016. We have had an opportunity to review the letter, which we incorporate by reference, and join Brentwood Hills in its numerous concerns regarding the adequacy of the project's DEIR.

In particular, we share Brentwood Hills' following concerns that:

- Potentially significant environmental impacts associated with proposed towers within and adjacent to the Santa Monica Mountains National Recreation Area and Topanga State Park, some on or near significant ridgelines, within the Coastal Zone, or near scenic highways and corridors, have not been identified or adequately analyzed. Existing facilities at some of these sites are considerably smaller than the proposed towers, and thus cannot justify a finding of no significant impact.
- The DEIR fails to analyze the "no project" alternative on a site-by-site basis.
- The DEIR fails to analyze alternative tower heights, technologies, and configurations.
- The DEIR fails to properly analyze the environmental impacts of the proposed towers on wilderness area resources, including visual, aesthetic, biological, parkland, and ecological resources, among others.

CHAIRS EMERITI
 Shirley Cohen
 Jerome C. Daniel
 Patricia Bell Hearst
 Alan Kishbaugh
 Gordon Murlay
 Steve Twining
 CHAIRS IN MEMORIAM
 Brian Moore
 Polly Ward



Comment Letter NGO 2

5 | • If all potentially significant impact areas are properly analyzed, some parkland locations will likely be deemed inappropriate for inclusion in the proposed project due to significant unavoidable impacts, including the Green Mountain (GRM) and Topanga Peak (TOP) sites.

Thank you for your consideration of the Hillside Federation’s concerns.

Sincerely,

Marian Dodge
Marian Dodge

Responses to Comment Letter NGO 2

The Authority appreciates the Federation of Hillside and Canyons Association’s comments on the Draft EIR dated February 22, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: The Federation is aware of a DEIR comment letter submitted by our member organization, Brentwood Hills Homeowners Association, dated February 20, 2016. We have had an opportunity to review the letter, which we incorporate by reference, and join Brentwood Hills in its numerous concerns regarding the adequacy of the project’s DEIR.

Response to Comment 1: The Authority acknowledges the incorporation of the Brentwood Hills Homeowners Association into this comment letter. In response, the Authority incorporates its responses to those comments by reference.

Comment 2: Potentially significant environmental impacts associated with proposed towers within and adjacent to the Santa Monica Mountains National Recreation Area and Topanga State Park, some on or near significant ridgelines, within the Coastal Zone, or near scenic highways and corridors, have not been identified or adequately analyzed. Existing facilities at some of these sites are considerably smaller than the proposed towers, and thus cannot justify a finding of no significant impact.

Response to Comment 2: The Draft EIR identifies and fully analyzes impacts at each of the 54 sites evaluated for each of the 13 environmental resource areas, as discussed in Chapter 3 and Chapter 4 of the Draft EIR. Pursuant to CEQA, a significance determination was made for each impact at each site as described in Chapter 4, aggregated in Chapter 3, and summarized in the executive summary (in particular Table ES-1 and Table ES-2) of the Draft EIR.



The Draft EIR includes information that 12 of the 54 sites analyzed are located within or adjacent to the Santa Monica Mountains National Recreation Area and/or Topanga State Park. These are sites CPK (discussed at Draft EIR, page 4-296)², ENC1 (page 4-372), ENT (page 4-411), GRM (page 4-566), H-69B (page 4-643), LACF072 (page 4-799), LACFCP08 (page 4-837), LEPS (page 4-989), PWT (page 4-1371), SPN (page 4-1563), TOP (page 4-1722), ZHQ (page 4-2026). Of these 12 sites, two sites (LACFCP08 and PWT) are on land administered by the National Park Service, and one site (site GRM) is located on land administered by the California Department of Parks and Recreation in Topanga State Park.

The Draft EIR analysis also considers that:

- Six of these 12 sites (sites CPK, ENT, H-69B, LACFCP08, SPN, and TOP) were identified on significant ridgelines.
- Eight of these 12 sites (sites CPK, ENC1, GRM, LACF072, LACFCP08, PWT, SPN, TOP) are in the coastal zone.
- Nine of these 12 sites (sites CPK, ENC1, ENT, H-69B, LACF072, LACFCP08, PWT, SPN, and TOP) are adjacent to a scenic highway or regional trail.

Of the 12 sites identified above, existing communication support structures occur at sites CPK, GRM, SPN, TOP, and ZHQ. Because these sites already contain communication support structures which are a part of the existing viewshed, it was determined that the addition of a proposed new structure would result in an added visual intrusion to the area, but would not block or remove views, and therefore the visual impacts would not be significant.

Of the seven other sites in the Santa Monica Mountains National Recreation Area and/or Topanga State Park:

Site ENC1 is situated in an existing fire camp, amongst topography and tall vegetation that obscure the view of the proposed 180-foot tower and associated infrastructure, and aesthetic impacts were determined to be less than significant.

Site ENT includes existing large water towers. While the proposed 70-foot monopole and associated infrastructure would be visible from above, it would not result in a substantial adverse effect on any scenic vista, and aesthetic impacts were determined to be less than significant.

Site LACF072 is an existing fire station that is somewhat developed, containing tall vegetation. Views of the site from Decker Canyon Road are obscured by the cut banks along the roadway, which is lined by telephone/power poles. The site would not interfere with scenic vistas therefore impacts on scenic vistas were determined to be less than significant.

Site LACFCP08 is a developed fire station in an area that has been highly disturbed and is not easily visible from readily accessible viewpoints. The proposed new 70-foot monopole and associated

² Unless otherwise noted, all page numbers refer to pages in the Draft EIR that contain relevant site-specific analysis, which is incorporated by reference herein.



infrastructure would not block or remove views, nor create a substantial impact on a scenic vista. Impacts to aesthetics were determined to be less than significant.

Site LEPS includes a water tank, that is not currently visible from Encinal Canyon Road. The proposed 70 foot monopole and associated infrastructure would be visible, but the greatly varying topography would help to obscure the monopole from some locations. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Aesthetic impacts were determined to be less than significant.

Site PWT is adjacent to an existing water tank, and the proposed 28-foot monopole and associated infrastructure would not exceed the height of this existing infrastructure. Scenic views would not be substantially impacted, and aesthetic impacts would be less than significant.

Site H-69B is already highly disturbed, but the site is located on a scenic route on a significant ridgeline that contains no current infrastructure. Views would be substantially altered, since no infrastructure is present. As a result, the Draft EIR determined that aesthetic impacts at the site would be significant. The only potential mitigation measure for this impact would be to paint the structure. However, this mitigation is infeasible as FAA standards would dictate any painting or camouflaging activities associated with the proposed 180-foot tower for aviation safety purposes. Impacts were determined to be significant and unavoidable at this site.

The comment does not provide any evidence that would result in any revisions to the Draft EIR's conclusions.

Comment 3: The DEIR fails to analyze the “no project” alternative on a site-by-site basis.

Response to Comment 3: The Draft EIR defines the No Project Alternative as a scenario in which none of 54 sites considered within the Draft EIR would be constructed in compliance with CEQA Guidelines section 15126.6(e)(3)(B), which states that when the proposed project is a development project on identifiable property, the “no project” alternative is the scenario under which the project does not proceed.

Not constructing one or more of the individual towers proposed would not represent the “no project” alternative as defined in CEQA, and would result in a failure to meet the project objectives set forth in Draft EIR section 2.2 in the geographic location served by that site. Specifically, within that geographic area there would be:

- no day-to-day communications made available for first and second responders
- no interoperability among member agencies and mutual aid providers
- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications



- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements
- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains National Recreation Area and Topanga State Park provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains National Recreation Area and Topanga State Park substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales. The ultimate selection of which sites will be constructed will be determined based on consideration of the public comment on the Draft EIR, as well as ultimate site feasibility during final system design. Ultimately the system design will seek to maximize Project Objectives discussed in Draft EIR Section 2.2.

Comment 4: The DEIR fails to analyze alternative tower heights, technologies, and configurations.

Response to Comment 4: Various other types of technologies and configurations were considered and subsequently eliminated from further consideration because they would not meet project objectives and/or they would not be feasible for additional reasons (see DEIR Section 2.6).

A “Collocation” alternative was considered that would have limited LMR antennas to existing structures. Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage, would not meet the Project objectives and was not considered further.

An alternative identified as “Use Cell on Wheels” (COW) was considered and would have included portable towers or monopoles with self-contained equipment and generators. Height limitations for portable towers and equipment weight limitation for portable monopoles limited applicability to only a few sites and would not provide desired coverage. Use of COWs would not meet the Project objectives and was not considered further.

An alternative identified as “Use of Satellites” was considered, and it was determined that LMR communication could be conducted by using a satellite system. However use of satellites for LMR communication would result in a lag time between sender and receiver that does not allow for quick communication required during emergencies. Use of satellites would not meet the Project objectives and was not considered further.

Additionally, the Authority reviewed various telecommunications options and worked with industry experts to modernize their systems, and ease transition from the existing network to a hybrid of digital and analog networks to provide a mobile data system. In November 2011, requests for proposals were developed to support the hybrid system. In January 2012, proposals were received and a vendor was chosen. No alternative system to the hybrid system was identified.



Final design of the system will occur if the project is approved. At that time, tower heights would be optimized based on the final system design. Some of these sites would be constructed nearly exactly as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. Other reasons for a change in height could include (but are not limited to) items such as subsurface constraints for foundation depths, compliance with FAA requirements, or coastal consistency issues. At this time, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.

The analysis conducted in Chapter 2 of the Draft EIR; Sections 2.1.2.1 Project Site Components and 2.1.2.2 Project Site Types provides the best design information currently available for the project. Exhibits 2.1-2 through 2.1-6 also show the general appearance of the project types and size and composition of the enclosures. Impacts associated with construction of the proposed project types, including grading, are discussed in detail in Draft EIR Section 2.1.3 Construction. Impacts associated with operation and maintenance of the proposed project is discussed in detail in Draft EIR Section 2.1.4 Operations and Maintenance. Associated impacts are analyzed in Chapters 3 and Chapter 4 of the Draft EIR

Comment 5: The DEIR fails to properly analyze the environmental impacts of the proposed towers on wilderness area resources, including visual, aesthetic, biological, parkland, and ecological resources, among others.

Response to Comment 5: Wilderness is defined in the Wilderness Act of 1964 as “an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.” (See Draft EIR, p. 3-494.) There are no wilderness areas in the Santa Monica Mountains National Recreation Area or Topanga State Park. The closest wilderness areas to the project are the San Gabriel Wilderness in the San Gabriel Mountains National Monument, which is approximately 1.5 miles north of the Pine Mountain site (PMT), and the Cucamonga Wilderness in the Angeles National Forest, which is approximately 3 miles northeast of the Sunset Ridge sites (SUN and SUN2). (See Draft EIR, p. 3-53.) The Draft EIR analyzed the potential impacts of the proposed project on aesthetics, biological resources, and recreation and determined that impacts would be less than significant. The Draft EIR also fully analyzed environmental impacts of the proposed towers on visual, aesthetics, biological, parkland and ecological resources. Site specific analysis for each of the 54 sites in the Draft EIR is provided in Chapter 4 and is summarized, as applicable in Chapter 3; Specifically, Section 3.1 (“visual” and “aesthetics”), Section 3.3 (“biological” and “ecological resources”) and Sections 3.9 and 3.11 (“parkland”). The Draft EIR was prepared in accordance with CEQA and the CEQA Guidelines, PRC Section 21000 et seq. and 14 CCR Section 15000 et seq., respectively.

Comment 6: If all potentially significant impact areas are properly analyzed, some parkland locations will likely be deemed inappropriate for inclusion in the proposed project due to significant unavoidable impacts, including the Green Mountain (GRM) and Topanga Peak (TOP) sites.



Response to Comment 6: As discussed in response to your comments above, and as stated in the Draft EIR, no significant and unavoidable impacts were found for sites GRM or TOP. (See DEIR pp. 4-566 through 4-603 (GRM) and pp. 4-1722 through 4-1761 (TOP).) The project site locations have been selected to maximize coverage to enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists. Your opposition to the project locations within the Santa Monica Mountains National Recreation Area, Topanga State Park, and Temescal Park are noted, is included in the record of proceedings, and will be considered by the Authority’s decision makers in connection with their consideration of the proposed project.



Comment Letter NGO 3



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February 25, 2016

Los Angeles Regional Interoperable Communications System
Joint Powers Authority
2525 Corporate Place
Suite 100
Monterey Park, California 91754

Sent by: Certified Mail and By E-Mail to DraftEIR,Hotline@la-rics.org

RE: Comments on Draft EIR of the Catalina Island Conservancy

The Santa Catalina Island Conservancy (Conservancy) is the Santa Catalina Island landowner, where the new and additional towers for the Los Angeles Interoperability Communications System (LA-RICS) proposal of Land Mobile Radio (LMR) systems is to be installed. The Conservancy acts as a responsible steward of its lands. We give tremendous efforts toward conservation and Catalina wildland aesthetics. The Conservancy supports the LA-RICS project goal proposal of Land Mobile Radio (LMR) Systems to be installed on Blackjack Peak (BJM), Dakin Peak (DPK), Tower Peak (TWR). The Conservancy hereby submits the following comments on the Draft Environmental Impact Report (Draft EIR) dated January 2016.

The Santa Catalina Island Conservancy is a 501(c)(3) non-profit corporation and is the fee simple owner of its lands and is responsible for all aspects of conservation and land management in accordance with its Articles of Incorporation and strategic and other plans.

A summary of the main issues regarding the project are provided in the body of this letter. Specific comments are referenced to section, table, page number and/or figure in Attachment A to this letter.

The Conservancy's main issues with the Draft EIR fall into four main categories: Aesthetic/Viewshed Analysis, Alternatives Analysis, Environmental Impacts/Mitigation and Local Zoning Requirements.

Aesthetic/Viewshed Analysis

Based on our review of the Draft EIR, the document plays short shift with this issue, basically concluding that since there is already a 100 foot tower at all three proposed sites (BJM, DPK, TWR), there are no aesthetic or viewshed issues with building a second 180-200 feet tower (plus 15 foot lighting rod) adjacent to the existing tower. It is the Conservancy's position that "co-location" does not resolve this issue for Catalina Island. All three existing towers can be viewed from multiple, long distance vantages as you approach Catalina Island from the sea. They are also distinct features from multiple vantages throughout Catalina Island's interior. Blackjack Peak is the third highest mountain on Catalina Island and it and its tower can be seen from locations from the far East End to the far West End of the Island. The new towers will be

1

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twice as tall, wider at the base, and also permanently lit at night. They will permanently and irrevocably alter the skyline of the Island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites.

1 | 2

Alternatives Analysis

This issue is closely related to the aesthetic/viewshed issue. The Conservancy believes the alternatives analysis in the Draft EIR is incomplete in that it does not specifically address at least two obvious alternatives than the one selected. First, the Draft EIR does not address whether the existing 100 foot towers could be replaced by a single larger tower that could house all of the antennas and dishes of the existing tower plus the antennas and dishes for the LA-RICS LMR project. This alternative, if acceptable, would help to resolve the aesthetic/viewshed issue discussed above in that while the replacement tower would be much taller, there would still only be one tower at each of the three sites. Second, the Draft EIR does not discuss as an alternative whether an additional tower is actually needed at all three locations to accomplish the LA-RICS LMR project goals. Third, the Draft EIR does not discuss whether a second much larger tower at one location plus larger replacement towers at the other two sites is an option (or other variants on this theme).

3 | 4 | 5

The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites. The Conservancy believes the project proponent should provide to the Conservancy and the Island Community 3D animations from multiple vantage points and appropriate GIS maps of the various alternatives for all three sites discussed here and in the Draft EIR.

6

Environmental/Mitigation Issues

As outlined in detail in Attachment A, the project as proposed entails a number of less-than-trivial environmental and mitigation issues. The Conservancy has proposed Catalina-specific language and requirements that it would like to see incorporated into the various tables and text of the Draft EIR. Three main issues emerge from the Conservancy's review of the environmental issues associated with the project:

7

1) While the Blackjack site appears to have an already developed pad that would allow the construction of a new or replacement tower without further habitat disturbance, the Dakin Peak and Tower Peak sites do not appear large enough to accomplish this with permanent alteration of natural habitat. In particular, level ground at the Tower Peak site is fully occupied by the existing tower, shed, and generator and to co-locate a second tower or even replace the existing tower with a new larger tower would appear to require cutting down the existing peak 10-20 feet or more or significant fill and grading to create a large enough level space. Given the stringent regulatory requirements specific to Catalina Island in the Los Angeles County Zoning Code (see discussion below), the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with actual, not "typical" site plans.

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2) The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected

9

3) The Draft EIR should include on-the-ground mitigation proposals and not just the "process" (plans, inspections, construction practices, etc.) proposed in the Draft EIR. The Conservancy will expect that unavoidable, and permanent habitat or species impacts will be mitigated by on-the-ground improvements and long-term monitoring (e.g. of bird or bat mortality) funded by annual return from a monitoring fund.

10

Local Zoning Requirements

Finally, the Conservancy was surprised to not find any discussion of the stringent zoning requirements applicable to the Island found in Title 22 of the Los Angeles County Code. The 1983 Local Coastal Plan, which is referenced in the Draft EIR, was codified into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code and is the controlling rule for approving development on Santa Catalina Island. Principal and Accessory Permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. The current EIR is silent as to whether the proposed new towers at BJM, DPK and TWR will comply with the standards in Title 22 applicable to Catalina Island. Again, the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites in relation to now codified LCP in Title 22. Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit process, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.

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In closing, the Conservancy wishes to emphasize that it is fully in support of the broad goals and improvements in safety, emergency response and law enforcement which will come from the implementation of the LA-RICS LMR project. However, given its own mandates in its corporate charter for the long-term care and protection of its lands on Catalina Island, a much more detailed and nuanced, island-specific analysis is required for the tower locations proposed on the island.

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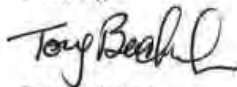


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The Conservancy is looking forward to engaging further with LA-RICS LMR project and working to a resolution of the issues we have raised.

Sincerely,



Tony Budrovich
Chief Operating Officer



John J. Mack
Chief Conservation and Education Officer

cc: Ann Muscat, President and CEO
Conservancy Board of Directors

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ATTACHMENT A

Table ES-2. AES-1 through 4. As discussed in the general comments section, the Conservancy does not concur with the analysis or results of the Aesthetic Review.	13
Table ES-2. BIO-MM-1. The EIR should state the Conservancy will need to review and concur in the Mitigation Monitoring and Reporting Plan (MMRP) and Worker Environmental Awareness Program (WEAP) plans prior to initiating any construction activities on its lands.	14
Table ES-2. BIO-MM-1. The EIR should state that for sites DPK, BJM, TWR the biological monitor shall visit the sites at least once per week during weeks when construction workers are present on site, and at least monthly during periods when active construction is not occurring but the project is not yet completed and the biological monitor shall contact the Conservancy's Director of Conservation prior to each visit in order to coordinate a joint site inspection with Conservancy staff.	15
Table ES-2. BIO-MM-4. Site Sanitation. The EIR should state that all solid waste will be placed in wildlife proof containers with tight fitting secure lids. Containers with any liquids of any sort, e.g. drums, roll-off boxes, dumpsters, etc., shall be tightly sealed to prevent foxes or other wildlife from drowning in the containers.	16
Table ES-2. BIO-MM-5. The EIR should state that only "hazardous materials" allowed on the site are fuel, equipment lubricants or other materials, such that if disposed would not be considered "hazardous waste" under the Resource Conservation and Recovery Act (RCRA) or equivalent state law hazardous waste definitions.	17
Table ES-2. BIO-MM-8. The EIR should specifically reference the Catalina Island Fox for sites BJM, DPK and TWR and state that all holes, trenches or other excavations must be completely and securely covered at the end of each work day and/or provided with fox escape ramps.	18
Table ES-2. BIO-MM-9(b). The EIR should state that surveys for special status plant species at sites BJM, DPK, and TWR will be performed during the appropriate time of year for the particular species, e.g. spring surveys for special status annual plants, to be observed and identified.	19
Table ES-2. BIO-MM-9(f). The EIR should state that for sites BJM, DPK and TWR the limits of disturbance shall be clearly delimited with properly installed construction fencing or closely-spaced 4 foot grading stakes with at least two signs per side of the construction site that state, "No Equipment or Soil Disturbance Beyond this Point."	20
Table ES-2. BIO-MM-11. The EIR should state that for sites BJM, DPK and TWR the Project contactor(s) shall obtain all necessary Conservancy vehicle access permits at least 30 days prior	21

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to bringing vehicles or other wheeled equipment onto Conservancy lands. Project contractor(s) shall also provide proof of insurance (\$1,000,000) for any damage to Conservancy infrastructure and provide a written plan for how Conservancy primary and secondary roads will be used, contingencies for non-use or upgrade during rainy periods, frequency of access, minimizing ingress and egress, etc. | 21

Table ES-2. BIO-MM-23(a). The EIR should state that for sites BJM, DPK and TWR only seeds or plants obtained from the Conservancy's native plant nursery will be used for revegetating disturbed ground at the project sites. | 22

Table ES-2. BIO-MM-23(b). The EIR should state that for sites BJM, DPK and TWR, vehicles or other equipment shall enter Conservancy unless inspected by the Conservancy's Invasive Plant Program Manager. | 23

Table ES-2. CUL-1. The EIR should add BJM, DPK and TWR to the "sites" column for CUL-1 rows. All three sites have known cultural locations on (BJM) or within 500 foot buffer. The EIR should state that for sites BJM, DPK and TWR that an archeology monitor is present at all times excavation is occurring at each site. | 24

Table ES-2. HAZ-4-MM-1. The EIR should state that for sites BJM, DPK and TWR the construction contractor shall coordinate the completion of the Phase 1 audit with the Conservancy's Chief of Conservation and provide the Conservancy an opportunity to review the draft audit prior to finalization. | 25

Table ES-2. HAZ-8-MM-3. The EIR should state that for sites BJM, DPK and TWR, the draft Fire Management Plan be provided to the Conservancy for its review and comment prior to initiating construction activities. | 26

Table ES-2. WQ-1. The EIR should state that for sites BJM, DPK and TWR all stormwater and sediment generated shall be contained within the marked disturbance footprint. For site BJM, unmanaged stormwater from the existing access road to the site is causing serious erosion and damage to the Conservancy's Blackjack Campground Road which must be addressed in order to expand the uses at the BJM site. | 27

Table 2.1-1. Dakin Peak is located on Divide Rd. | 28

Table 2.1-3. Anticipated Construction Activities. It appears that both the DPK and TWR sites would require substantial amounts of cutting and filling to create sufficient space for new or replacement towers. Any fill used will need to be certified as weed free. If this is not possible, funds from the interest of an invasive plant control fund will need to be provided in order for the Conservancy to perform invasive plant surveys and/or control at the sites for at least 10 | 29

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years. The applicable BIO standard should also be modified to reflect this potential invasive introduction.	29
Figure 2.1-3. The proposed new lattice towers at BJM, DPK and TWR will be significantly taller than the existing towers. The current EIR does a cursory analysis of aesthetic and viewsheds effects as well as potential for additional or worse migratory bird fatalities (See general discussion in letter).	30
Figure 2.1-4. The typical site plan appears to require substantially more space than is present in the already developed areas at these locations which will require destruction of natural habitat at DPK and TWR, which is not addressed in the EIR.	31
Section 2.1.2.1. Emergency Generators. Fuel tanks are very large and given remote locations, secondary containment must be a feature of the BJM, DPK and TWR sites.	32
Section 2.1.2.1. Lighting. Security lights should be motion sensitive and should not remain on throughout the night. Existing towers at BJM, DPK and TWR have red navigation lights. Cumulative negative effect of additional tower with light was not discussed in EIR.	33
Section 2.6. Alternatives Considered. There is no discussion as to why the existing 100 ft towers cannot be replaced with a single, new, much larger tower that can be instrumented with all the dishes and antennas required by the existing tower and the LA-RICS LMR system. This option would preserve the existing viewsheds and location aesthetics of a single tower at these locations rather than a two tower approach.	34
Section 3.1.1. Conservancy lands should be accorded the same "high visual sensitivity" as public lands where the owner/management entity is focused on natural resource protection and protection of scenic resources. The Conservancy's articles of incorporation mandate both of these for Conservancy lands. Under the 1974 Open Space Easement Agreement with Los Angeles County, Conservancy lands are also part of the Los Angeles County parks system.	35
Table 3.1-1. Regional or municipal park should also be checked for the BJM, DPK and TWR sites.	36
Section 3.1.1.3. TransCatalina Trail. As it is part of Los Angeles County Park system's trail network, please delete the "Although it has no official scenic designation."	37
Section 3.1.1.4. Conservancy lands are Open Space Easement areas in the Los Angeles County park system and should be listed in this section as such.	38
Section 3.1.2.3, 3.1.4, 3.1.5. Santa Catalina Island. The 1983 Local Coastal Plan was codified into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code which is the controlling rule for approving development on Santa Catalina Island. Principal and	same as 11 above

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Accessory Permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. The current EIR is silent as to whether the proposed new towers at BJM, DPK and TWR will comply with the standards in Title 22 applicable to Catalina Island. In addition, the addition of a second tower that is 80-100 feet taller than the existing towers at BJM, DPK and TWR, the second tower at these sites represents a significant alteration of island viewsheds and deserves a more robust analysis than accorded in Sections 3.1.4 and 3.1.5 of the Draft EIR, and, if eventually permitted, actual mitigation. Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit process, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.

same as
11 above

same as
12 above

Section 3.3.1. Prior to finalizing the EIR, the extensive databases maintained by the Catalina Island Conservancy should be consulted and results included in the EIR (See attached maps). The fall floristic survey performed needs to be supplemented by a spring survey in order to be considered sufficient.

39

Table 3.1-1. For the BJM, DPK and TWR sites, plant communities within 500 feet of the existing tower include the following: Island Scrub Oak (*Quercus pacifica*) Chaparral, Coastal Sage Scrub, Non-native Grassland.

40

Table 3.3-3. The following text should be substituted for that in Table 3.3-3:

Site BJM is located on the top of Blackjack Peak, the third highest mountain on Catalina Island. North facing slopes of Blackjack are dominated by intact Island Scrub Oak (*Quercus pacifica*) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). A former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Black jack peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southeast of the peak, and the Airport Road, very popular for motor tours, just to the northwest.

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Table 3.3.-3. The plant species list in this table for Blackjack Peak should be as follows (Note all edit species list in Section 4.0 Site Summary Forms. Species not listed here have no records near project site):

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The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

- Arctostaphylos catalinae*
- Atriplex coulteri
- Ceanothus megacarpus var. insularis
- Crossosoma californicum
- Crocanthemum greenei
- Dendromecon harfordii*
- Dichondra occidentalis
- Dissanthelium californicum
- Eriogonum giganteum var. giganteum
- Eschscholzia ramosa
- Galium catalinense ssp. catalinense
- Galium nuttallii ssp. insulare*
- Gilia nevinii
- Hordeum intercedens
- Jepsonia malvifolia
- Lepechinia fragrans
- Lyonothamnus floribundus ssp. floribundus
- Ophioglossum californicum
- Quercus tomentella
- Ribes viburnifolium
- Scrophularia villosa
- Solanum Wallacei*

42

Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand Canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Dakin peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.

43

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

- Arctostaphylos catalinae
- Atriplex coulteri
- Ceanothus megacarpus var. insularis
- Crossosoma californicum
- Crocanthemum greenei
- Dudleya virens ssp. insularis

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Eriogonum giganteum var. giganteum**
 Eschscholzia ramosa
 Hordeum intercedens
 Jepsonia malvifolia
 Lyonothamnus floribundus ssp. floribundus
 Quercus tomentella
 Ribes viburnifolium
 Scrophularia villosa
 Solanum Wallacei

44

Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Tower Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Banning Road immediately west of the existing tower.

45

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "**" within 500 feet):

Atriplex coulteri
 Constancea nevinii
 Crossosoma californicum
 Cryptantha wigginsii
 Deinandra clementina
 Dichondra occidentalis
 Dissanthelium californicum (1400 feet west of site)
 Dudley virens ssp. hassei
 Eriogonum giganteum var. giganteum
 Eriogonum grande var. grande
 Eschscholzia ramosa
 Galium catalinense ssp. catalinense
 Gambelia speciosa
 Hordeum intercedens
 Jepsonia malvifolia
 Lyonothamnus floribundus ssp. floribundus
 Pentachaeta lyonii (1400 feet northwest of site)
 Ribes viburnifolium**
 Scrophularia villosa

46

Section 3.3.1.6. Local Policies and Ordinances. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

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Section 3.3.2.3. Local Regulatory Setting. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island. | 48

Table 3.3-7. Species with Suitable Habitat within Study Areas. The following should be added to this table: | 49

Burrowing Owl: BJM, DPK, TWR
California Mountain Kingsnake: BJM | 49

Section 3.3.4.1, Page 3-147 4th full paragraph and 3-148 first full paragraph. Burrowing owls are frequently observed throughout Catalina Island and should be listed for the BJM, DPK and TWR sites. | 50

Section 3.3.4.1, Page 3-149. Migratory Birds. The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the Island. The Conservancy believes the Draft EIR must take a island-specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected. | Same as comment 9 above

Section 3.3.4.1, Pages 3-154 to 3-155. Santa Catalina Island Fox. The following changes should be made: | 51

1st Paragraph, 1st Sentence should state: "The Santa Catalina Island Fox is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development."

1st Paragraph, last sentence should state: "Young can be born any time from late February through late April..."

2nd Paragraph, should state: "The major threat to Catalina Island Foxes have been disease outbreaks, e.g. the canine distemper outbreak in the late 1990s that almost wiped out the population, and mortality from vehicle collisions or other dangers associated with human development, e.g. drowning in open containers of liquids, poisoning, becoming trapped in open excavations. Catalina Island Foxes should be expected at all three Catalina Island project sites and should definitely expected to investigate any changes to the sites during active construction, especially open holes and trenches, open containers of liquids and improperly enclosed solid or food wastes."

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3rd Paragraph, Construction Impacts should read: The noise and activities associated with construction of the proposed Project sites could result in temporary disturbance of fox. Therefore, construction cannot be initiated from late February the end July. Foraging foxes will investigate the construction site for new food sources and for cover in uncovered excavations, under equipment or stored materials. Discarded food and trash is effectively an attractive nuisance for foxes and can result in increased habituation and dependence on humans for food." 51

BIO-MM-19(e). Add the following: "Any trenches, holes or other excavations that are not covered at the end of the work day, must be provided with a fox escape ramp." 52

BIO-MM-20(a). Add the following: "Crews should be informed that there is absolutely no feeding of foxes allowed on Catalina Island." 53

Section 3.3.4.1, Pages 3-157 to 3-158. Small Animals, California Mountain Kingsnake, Coast Horned Lizard, San Diego Woodrat, Tehachapi Pocket Mouse, Townsend's Big-eared Bat and Western Mastiff Bat. The Conservancy has documentation of California Mountain Kingsnake at nearby Blackjack Campground. Townsend's Big-eared Bats breed on Catalina Island in caves and abandoned mines. 54

Section 3.3.4.1, Pages 3-158 and 3-159. BJM should be added to the list of sites at the top of page 3-158, in the fourth full paragraph of page 3-158, and in the first full paragraph on page 3-159. 55

Section 3.3.4.1, Page 3-168. BIO-MM-23(a). Add the following: "For sites BJM, DPK and TWR, only seed or plant material from the Catalina Island Conservancy's native plant nursery shall be used." same as comment 22

Section 3.3.4.1, Page 3-169. BIO-MM-23(b). Add the following: "For sites BJM, DPK and TWR, all construction vehicles and equipment shall be washed prior to being brought to Catalina Island and shall not enter Conservancy property until it is inspected by the Conservancy's Invasive Plant Program Manager." 56

Section 3.3.4.1, Page 3-207. See earlier comment regarding reference to Title 22 regulations. 57

Table 3.3-12. Special Status Species. The following species should be added to this table for Sites BJM, DPK and TWR: 58

- Burrowing Owl
- Island Loggerhead Shrike
- Catalina Island Quail
- San Clemente Spotted Towhee
- Hutton's Vireo

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In addition, the consultant should refer to Appendix G of the LCP for other species of special concern regulated under Title 22 of the LA County Code. 58

Section 3.4. Cultural Resources. Extensive prehistoric and historic cultural resources are present nearly everywhere on Catalina Island. Human habitation and use of the island extends at least to 8,000 BP and likely much earlier. Any excavation or drilling, even in previously developed areas, should expect to encounter cultural artifacts, human remains, middens, lithic scatters, and/or habitation sites. All three Catalina Island sites have mapped cultural locations in or near the project location (see attached maps). No excavation or soil disturbance should be undertaken without an archeological monitor present. All of the tables and text in Section 3.4 should be edited to include BJM, DPK and TWR as actual or likely locations for cultural resources to be present. 59

Section 4.0. Site Summary Forms.

All site summary forms for BJM, DPK and TWR should be thoroughly edited to reflect changes discussed above. 60

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Responses to Comment Letter NGO 3

The Authority appreciates your comments on the Draft EIR dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: Aesthetic/Viewshed Analysis. Based on our review of the Draft EIR, the document plays short shift with this issue, basically concluding that since there is already a 100 foot tower at all three proposed sites (BJM, DPK, TWR), there are no aesthetic or viewshed issues with building a second 180-200 feet tower (plus 15 foot lighting rod) adjacent to the existing tower. It is the Conservancy's position that "co-location" does not resolve this issue for Catalina Island. All three existing towers can be viewed from multiple, long distance vantages as you approach Catalina Island from the sea. They are also distinct features from multiple vantages throughout Catalina Island's interior. Blackjack Peak is the third highest mountain on Catalina Island and it and its tower can be seen from locations from the far East End to the far West End of the Island.

Response to Comment 1: Of the three proposed sites on Catalina Island, the existing tower at Site TWR site is 100 feet tall; the existing tower at Site BJM is 125 feet tall; and the existing tower at Site DPK is 200 feet tall, as noted in the Draft EIR at pages 4-110 and 4-335, respectively. Each existing tower is a lattice type. The existing towers are prominent visual features in the existing landscape, as shown in the example photos below of Site BJM. Based on the existing visual conditions at these sites, the Draft EIR describes the visual impact of locating new towers at these sites, and concludes that the addition of these towers would not result in a significant visual impact. (See DEIR pp. 4-113 to 4-114 (BJM), pp. 4-338 to 4-339 (DPK), and pp. 4-1802 to 4-1803 (TWR).) Additionally, two separate towers would be viewed as one structure from vantage points where one tower is in front of, and thus blocks views of, the other, and the increase in bulk associated with two separate towers would be minimal due to the linear nature of the structures. The comment provides no evidence that that requires a revision to the conclusions in the Draft EIR.





The comment is correct that all three existing towers could be viewed from multiple, long-distance vantages on the approach to Santa Catalina Island from the sea. However, collocating the towers would result in the two towers appearing more indistinguishable as separate structures (see photos of site BJM below). The sites would also be obscured by extremely steep cliffs as boaters approach the island, particularly south and north of Site TWR, south and east of Site DPK, and north of Site BJM.

In addition, the heights of the proposed towers may ultimately be lower than analyzed in the Draft EIR. If the project is approved, tower heights would be optimized based on the final system design. Some sites would be constructed as they are described in the Draft EIR. Other sites may be designed to a shorter height if additional site information or system requirements found during later design stages made this feasible. At this time, however, it would be speculative to identify which sites might ultimately accommodate a reduced tower height.





Comment 2: The new towers will be twice as tall, wider at the base, and also permanently lit at night. They will permanently and irrevocably alter the skyline of the Island. The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites.

Response to Comment 2: While the new towers would be taller, they would not be “twice as tall” as existing towers. The BJM tower would be up to 180 feet tall and sited adjacent to an existing 125-foot tower; the DPK tower would be the same size as the existing tower (both 200 feet tall); and the TWR tower would be up to 180 feet tall and sited adjacent to an existing 100-foot tower. The lightning rods would be of such insignificant girth as to be generally indistinguishable from most viewing distances. Also, the heights of the proposed towers may ultimately be less than described in the Draft EIR, as explained above. Lighting at the tower is addressed for Site BJK at page 4-114, for Site DPK at page 4-339, and for Site TWR at page 4-1803. The analysis shows that regardless of the type of FAA-required lighting, no substantial new source of light or glare would be introduced at any of these sites.

While the new towers would alter the Island’s skyline, the Island’s skyline has already been altered by the presence of the existing towers. The new towers would not “substantially degrade the existing visual character or quality of the site and its surroundings” (Impact AES-3). Although the new towers would introduce a new manmade element to each site, the existing conditions demonstrate a substantially altered visual environment.

Comment 3: Alternatives Analysis. This issue is closely related to the aesthetic/viewshed issue. The Conservancy believes the alternatives analysis in the Draft EIR is incomplete in that it does not specifically address at least two obvious alternatives than the one selected. First, the Draft EIR does not address whether the existing 100 foot towers could be replaced by a single larger tower that could house all of the antennas and dishes of the existing tower plus the antennas and dishes for the LA-RICS LMR project. This alternative, if acceptable, would help to resolve the aesthetic/viewshed issue discussed above in that while the replacement tower would be much taller, there would still only be one tower at each of the three sites.

Response to Comment 3: As a preliminary matter, the existing towers at the three sites are not all 100 feet tall. The existing tower at Dakin Peak (DPK) is 200 feet while the towers at Tower Peak (TWR) and Black Jack Peak (BJM) are 100 feet and 125 feet tall, respectively. Regarding the suggested alternative of placing existing equipment and proposed LMR equipment all on a single larger tower, each of the existing towers currently has a substantial number of antennas, and the proposed project would add a minimum of twenty five (25) additional antennas to each site. Collocating all of this equipment on a single tower would require installation of a substantially taller and larger tower. Given the open nature of the surrounding landscape, replacing an existing tower with a new tower of an increased size and height would create a greater visual intrusion than the proposed addition of a single tower of the same or similar height to the existing structure. A higher tower would be more visible from a greater distance than two separate towers, particularly from distant vantage points such as boats approaching the Island. In addition, two separate towers would be viewed as one structure from vantage points where one



tower is in front of, and thus blocks views of, the other. The increase in bulk associated with two separate towers would also be minimal due to the linear nature of the structures compared to the increase in height that would be required to accommodate all existing and proposed equipment on a single tower. For these reasons, the alternative of placing existing equipment and proposed LMR equipment all on a single larger tower would not reduce or avoid the visual impacts of the proposed project at these sites, and no revisions to the Draft EIR are required to analyze this alternative.

Comment 4: Second, the Draft EIR does not discuss as an alternative whether an additional tower is actually needed at all three locations to accomplish the LA-RICS LMR project goals.

Response to Comment 4: The Authority did examine whether the existing towers could accommodate the proposed installation of LMR equipment in addition to the equipment currently located on the existing towers. As discussed above, each of the existing towers currently has a substantial number of antennas, and the proposed project would add a minimum of twenty five (25) additional antennas to each site. The Authority determined that it would not be feasible to locate all of the existing and proposed equipment on the existing towers, and that new towers would be required for each of the three sites to accommodate the proposed LMR equipment.

Comment 5: Third, the Draft EIR does not discuss whether a second much larger tower at one location plus larger replacement towers at the other two sites is an option (or other variants on this theme).

Response to Comment 5: The alternative suggested in this comment is unclear, but seems to suggest installation of larger towers at the three sites on the Island than currently proposed. Installing larger towers than those proposed would result in increased visual and other impacts. As such, the Draft EIR does not require revisions to analyze this alternative. The Authority’s proposed design seeks to minimize the impacts on aesthetics while still meeting project objectives.

Comment 6: The Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at this issue and how it should be resolved for all three proposed Catalina Island sites. The Conservancy believes the project proponent should provide to the Conservancy and the Island Community 3D animations from multiple vantage points and appropriate GIS maps of the various alternatives for all three sites discussed here and in the Draft EIR.

Response to Comment 6:

Site-specific analysis is provided in Chapter 4 for sites BJM (at pages 4-110 et seq.), DPK (at pages 4-335 et seq.), and TWR (at pages 4-1799 et seq.). The methodology for aesthetic impact analysis, provided in Section 3.1.4 starting on page 3-26 of the Draft EIR was applied to these sites. 3D animations from multiple vantage points and GIS maps of the commenter’s suggested alternatives are not a requirement for aesthetic impact assessment. An EIR is to be prepared with “a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluated of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is



reasonably feasible.” (CEQA Guidelines § 15151.) Additionally, “reviewers [of an EIR] should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” (CEQA Guidelines § 15204(a).) No change has been made to the Draft EIR.

Comment 7: Environmental/Mitigation Issues. As outlined in detail in Attachment A, the project as proposed entails a number of less-than-trivial environmental and mitigation issues. The Conservancy has proposed Catalina-specific language and requirements that it would like to see incorporated into the various tables and text of the Draft EIR. Three main issues emerge from the Conservancy’s review of the environmental issues associated with the project:

Response to Comment 7: Please see the responses to the comments in Attachment A, below, regarding the environmental and mitigation issues referenced in this comment. Please see the responses below for responses to the three main issues referenced in this comment.

Comment 8: 1) While the Blackjack site appears to have an already developed pad that would allow the construction of a new or replacement tower without further habitat disturbance, the Dakin Peak and Tower Peak sites do not appear large enough to accomplish this with permanent alteration of natural habitat. In particular, level ground at the Tower Peak site is fully occupied by the existing tower, shed, and generator and to co-locate a second tower or even replace the existing tower with a new larger tower would appear to require cutting down the existing peak 1-0-20 feet or more or significant fill and grading to create a large enough level space. Given the stringent regulatory requirements specific to Catalina Island in the Los Angeles County Zoning Code (see discussion below), the Conservancy believes the Draft EIR must take an island-specific, detailed and extended look at each of the three proposed sites, with actual, not “typical” site plans.

Response to Comment 8: The level of disturbance associated with project site development at all sites is limited to that analyzed in the EIR, as described in Section 2.1.3, and on a site specific basis for sites BJM (at page 4-110), DPK (at page 4-335), and TWR (at page 4-1799). The Authority will examine each site based on the site’s unique characteristics and propose the least intrusive installation while still meeting the Project’s Objectives. Regarding the request for “an island-specific, detailed and extended look at each of the three proposed sites”, please see response to comment 6 regarding the level of detail required in an EIR.

Comment 9: 2) The Draft EIR does only a cursory analysis of how migratory or resident birds or resident bats will be affected by up to three 200 foot lattice tower mounted with 80 whip antennas and multiple dishes. The island's position as a mountain in the ocean presents different risk factors than a typical mainland location to migratory species in particular who are flying across and over the



Island. The Conservancy believes the Draft EIR must take an island specific, detailed and extended look at each of the three proposed sites, with regards to the presumed increase in bird and/or bat mortality that would be expected.

Response to Comment 9: Please note that only one of the proposed towers on the Island (DPK) would be 200 feet. The others (BJM and TWR) are proposed at up to 180 feet. The Cumulative Impact Analysis section (3.3.5.3) on pages 3-239 through 3-241 of the Draft EIR gives an extensive discussion on the effects of towers on birds. BIO MM 18 (h) and (i) (page ES-44) give protection measures for migratory birds in relation to the communication towers. This measure states that the USFWS Office of Migratory Birds voluntary guidelines for communications towers will be followed for all sites (<https://www.fws.gov/Midwest/es/planning/pdf/USFWS2013RevisedGuidanceCommTowers27Sept13.pdf>). In addition, this measure requires coordination with USFWS and FAA to implement their lighting requirements (http://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_70_7460-1L_.pdf) with the minimal attraction and resulting mortality to migratory birds. These impacts will be addressed and minimized to the extent possible at *all* sites, including BJM, DPK, and TWR, individually based on coordination with FAA and USFWS. As noted at pages 3-157 and 3-158, impacts to bats are not anticipated. Additional text associated with this analysis will be included for the discussion of sites BJM, DPK, and TWR in this section in the Final EIR, as follows:

Bat mortality is not a concern due to new towers being added to any site or addition of lighting. Bats may be attracted to the lights for insect foraging, but strikes are not anticipated as all parts of the towers will be stationary and not mobile, thus allowing the bats to navigate safely around the structures.

Comment 10: 3) The Draft EIR should include on-the-ground mitigation proposals and not just the “process” (plans, inspections, construction practices, etc.) proposed in the Draft EIR. The Conservancy will expect that unavoidable, and permanent habitat or species impacts will be mitigated by on-the-ground improvements and long-term monitoring (e.g. of bird or bat mortality) funded by annual return from a monitoring fund.

Response to Comment 10: With the exception of cumulative impacts to migratory birds, the Draft EIR concluded that impacts to certain biological resources at sites BJM, DPK, and TWR would be significant but impacts would be reduced to less than significant with implementation of mitigation measures. A total of 16 mitigation measures were identified for implementation to protect biological resources at sites BJM, DPK, and TWR. These included measures specifically designed to avoid or minimize impacts to special status species and habitats. Since impacts have been determined to be less than significant after application of the measures identified in the Draft EIR, CEQA does not require further mitigation measures to be applied at sites BJM, DPK, and TWR.

Comment 11: Local Zoning Requirements. Finally, the Conservancy was surprised to not find any discussion of the stringent zoning requirements applicable to the Island found in Title 22 of the Los Angeles County Code. The 1983 Local Coastal Plan, which is referenced in the Draft EIR, was codified



into ordinance in Title 22, Sections 22.46.050 through 22.46.750, of the Los Angeles County Code and is the controlling rule for approving development on Santa Catalina Island. Principal and Accessory permitted Uses for Open Space/Conservation District zones are listed in Section 22.46.120 through 22.46.160. Development standards for archeological/historical, flora and fauna, soils and geology, slopes, fire, noise, view protection and signs are found in Sections 22.46.450 through 22.46.530. Development of communication equipment buildings and antennas require a Coastal Development Permit and Conditional Use Permit (Section 22.46.150) and must comply with view protection requirements in Section 22.46.520. **The current EIR is silent as to whether the proposed new towers at BJM, DPK, and TWR will comply with the standards in Title 22 applicable to Catalina Island.** Again, the Conservancy believes the Draft EIR must take an island specific, detailed and extended look at each of the three proposed sites in relation to now codified LCP in Title 22.

Response to Comment 11: Section 3.9.1.3 of the Draft EIR addresses sites in the coastal zone and the policies of the Local Coastal Plan that are most applicable to the proposed telecommunications facilities. Section 3.1.2.3 of the Draft EIR addresses relevant policies of the Santa Catalina Island LCP, and Table 3.9-2 identifies Sites BJM, DPK, and TWR as being located within the Santa Catalina Island Coastal Zone. Table 3.9-5 identifies site characteristics and coastal zone policies of relevance. The final determination of consistency for sites BJM, DPK, and TWR would be made by the Los Angeles County Department of Regional Planning, the agency responsible for issuing a Coastal Development Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions.

Additionally, Table 3.9-4 identifies planning and/or zoning designations for the proposed project sites. As shown in that table, the EIR's analysis found that implementation of the proposed project at sites BJM, DPK and TWR would not be inconsistent with relevant general plan and zoning designations.

The Authority will comply with Title 22 of the Los Angeles County Code as it develops the three sites on Santa Catalina Island, and the Final EIR has been updated at Section 3.9.4.1 to explicitly include this information in the discussion regarding the *Santa Catalina Island Local Coastal Plan*. Additional information relevant to biological resources, specifically plant species identified in Section 22.46.470 (Appendix G), has been included in the Final EIR in a list at Section 3.3.1.2. The added plant species would be considered during the coastal development permitting process. The proposed project and Mitigation Measures meet and/or exceed those measures outlined in Section 22.46.470 – Flora and Fauna. Relevant subsections of 22.6.470 include Section A, which requires a site plan with a 100 foot buffer of mapped vegetation prepared by a qualified botanist, impact analysis on native vegetation and wildlife, and suggested mitigation measures including transplanting vegetation or revegetating impacted areas; and Section B, preventing development that would remove or damage “rare or endangered plant species” as defined in Appendix G of the 1989 Santa Catalina Island Specific Plan; and G, development within SEAs shall be subject to Title 22 except for the exemption provisions contained in Section 22.56.215. The Authority believes that incorporation of the BIO MM 1, 2, 8, 3, 4, 5, 6, 8, 9, 10, 11, 17, 18, 19, 20, 23, and 24 at all sites on Santa Catalina Island will ensure adherence to Title 22 with regards to biological resources. These revisions do not result in any changes to the conclusions in the Draft EIR.



Comment 12: Finally in addition to the Title 22 requirements, two of the three tower locations (BJM, DPK) are located in Significant Ecological Areas (SEAs). Los Angeles County Code and Policy includes an additional level of review, over and above the CDP/CUP permit process, by the SEA Technical Advisory Committee (SEATAC) for projects located in SEAs or in LACA Lots where an SEA is located. This process is also not addressed in the relevant code summary sections of the Draft EIR.

Response to Comment 12: Section 3.3.2.3 of the Draft EIR acknowledges that the Los Angeles County SEAs ordinance regulates a wide range of biotic communities through the use of environmentally sensitive development standards and designs, and acknowledges the permitting process associated with these areas. Section 3.3.2.3 of the Draft EIR also discusses SEAs and explains that properties mapped within, or partially within, an adopted SEA are subject to the rules in the SEA ordinance. Table 3.3-10 acknowledges that the three sites are under the jurisdiction of the Santa Catalina Island Local Coastal Plan. The site-specific analysis beginning at page 4-121 and continuing at pages 4-123 and 4-125 (for Site BJM); at page 4-345 and continuing at pages 4-347 and 4-348 (for Site DPK); and at page 4-1809 and continuing at pages 4-1811 and 4-1812 (for Site TWR) provide SEA/CRA status and analysis of consistency with the LCP at each of the sites. As noted in the impact discussion for the three sites under Impact LU-2 (beginning at page 4-138 for Site BJM, page 4-363 for Site DPK and page 4-1827 for TWR), the final determination of consistency with the plan would be made by the agency responsible for issuing the coastal permit. If the permit were issued, activities at each site would occur consistent with any applicable permit conditions. Table 3.3-10 has been updated to reference the SEA/CRA designation applicable at the three sites. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 13: Table ES-2. AES-1 through 4. As discussed in the general comments section, the Conservancy does not concur with the analysis or results of the Aesthetic Review.

Response to Comment 13: Comment noted. See response to comment #1 and #2 above for additional information.

Comment 14: Table ES-2. BIO-MM-1. The EIR should state the Conservancy will need to review and concur in the Mitigation Monitoring and Reporting Plan (MMRP) and Worker Environmental Awareness Program (WEAP) plans prior to initiating any construction activities on its lands.

Response to Comment 14: In response to the comment, the following changes were made to BIO MM 1:

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, [coordination with the land management agency\(s\)](#), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.

And to BIO MM 2:

BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, [including coordination with the respective land management agency](#), a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

Comment 15: Table ES-2. BIO-MM-1. The EIR should state that for sites DPK, BJM, TWR the biological monitor shall visit the sites at least once per week during weeks when construction workers are present on site, and at least monthly during periods when active construction is not occurring but the project is not yet completed and the biological monitor shall contact the Conservancy's Director of Conservation prior to each visit in order to coordinate a joint site inspection with Conservancy staff.

Response to Comment 15: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined in response to comment #13 above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the biological monitoring site visit schedule suggested in Comment #14. No additional change has been made to BIO MM 1.

Comment 16: Table ES-2. BIO-MM-4. Site Sanitation. The EIR should state that all solid waste will be placed in wildlife proof containers with tight fitting secure lids. Containers with any liquids of any sort, e.g. drums, roll-off boxes, dumpsters, etc., shall be tightly sealed to prevent foxes or other wildlife from drowning in the containers.

Response to Comment 16: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site specific details through Authority/Conservancy coordination such as the solid waste provisions suggested in Comment #15. No change has been made to BIO MM 4.

Comment 17: Table ES-2. BIO-MM-5. The EIR should state that only "hazardous materials" allowed on the site are fuel, equipment lubricants or other materials, such that if disposed would not be considered "hazardous waste" under the Resource Conservation and Recovery Act (RCRA) or equivalent state law hazardous waste definitions.

Response to Comment 17: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the hazardous waste requirements suggested in Comment #16. No change has been made to BIO MM 5.



Comment 18: Table ES-2. BIO-MM-8. The EIR should specifically reference the Catalina Island Fox for sites BJM, DPK and TWR and state that all holes, trenches or other excavations must be completely and securely covered at the end of each work day and/or provided with fox escape ramps.

Response to Comment 18: Components of trench and hole management in reference to the Catalina Island Fox were included in the Draft EIR. The EIR specifically references the Catalina Island Fox for sites BJM, DPK, and TWR in Section 3.3, Santa Catalina Island Fox (page 3-154) and trench management under BIO MM 19 Trenches and Holes Management (pages ES-44 and 3-155-6). Trenches and holes would be covered and secured, as noted in subsection a), b), and e). Since all trenches and holes would be secured and inspected, no fox escape ramps would be necessary. No change has been made to BIO MM 8.

Comment 19: Table ES-2. BIO-MM-9(b). The EIR should state that surveys for special status plant species at sites BJM, DPK, and TWR will be performed during the appropriate time of year for the particular species, e.g. spring surveys for special status annual plants, to be observed and identified.

Response to Comment 19: The Draft EIR currently requires special status plant surveys to occur “in the proper season and in suitable habitat” (BIO MM 24). The phrase implies spring surveys for special status annual plants and any other season requirements for each plant species. The Draft EIR specifically references the Special Status Plants Surveys and Protection for sites BJM, DPK, and TWR in Table ES-2, and in Section 3.3, Special Status Plants: (page 3-167) and under BIO MM 24 Special Status Plants Surveys and Protection (pages ES-47 and 3-169). See page ES-47 for the full text for BIO MM 24 Special Status Plants Surveys and Protection. No change has been made to BIO MM 9.

Comment 20: Table ES-2. BIO-MM-9(f). The EIR should state that for sites BJM, DPK and TWR the limits of disturbance shall be clearly delimited with properly installed construction fencing or closely spaced 4 foot grading stakes with at least two signs per side of the construction site that state, "No Equipment or Soil Disturbance Beyond this point."

Response to Comment 20 The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the fencing requirements suggested in Comment #19. No change has been made to BIO MM 9.

Comment 21: Table ES-2. BIO-MM-11. The EIR should state that for sites BJM, DPK and TWR the project contactor(s) shall obtain all necessary Conservancy vehicle access permits at least 30 days prior to bringing vehicles or other wheeled equipment onto Conservancy lands. project contractor(s) shall also provide proof of insurance (\$1,000,000) for any damage to Conservancy infrastructure and provide a written plan for how Conservancy primary and secondary roads will be used, contingencies for non-use or upgrade during rainy periods, frequency of access, minimizing ingress and egress, etc.

Response to Comment 21: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details



through Authority/Conservancy coordination such as this issue. No change has been made to BIO MM 11.

Comment 22: Table ES-2. BIO-MM-23(a). The EIR should state that for sites BJM, DPK and TWR only seeds or plants obtained from the Conservancy's native plant nursery will be used for revegetating disturbed ground at the project sites.

Response to Comment 22: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the native seed provisions suggested in Comment #21 above. No change has been made to BIO MM 23(a).

Comment 23: Table ES-2. BIO-MM-23(b). The EIR should state that for sites BJM, DPK and TWR, vehicles or other equipment shall enter Conservancy unless inspected by the Conservancy's invasive plant Program Manager.

Response to Comment 23: The revision to BIO MM 1 to add “coordination with respective land management agencies”, as outlined above, will allow the Conservancy to request site-specific details through Authority/Conservancy coordination such as the invasive species prevention protocol suggested in Comment #22 above. No change has been made to BIO MM 23(b).

Comment 24: Table ES-2. CUL-1. The EIR should add BJM, DPK and TWR to the "sites" column for CUL-1 rows. All three sites have known cultural locations on (BJM) or within 500 foot buffer. The EIR should state that for sites BJM, DPK and TWR that an archeology monitor is present at all times excavation is occurring at each site.

Response to Comment 24: Based on records searches and field surveys, no prehistoric or historic archaeological resources were identified at sites BJM, DPK, or TWR that would be impacted by LMR project activities. However, to accommodate the concerns of the commenter, an archaeological monitor will be present during all ground-disturbing activities at sites BJM, DPK, and TWR. This information will be included for the three sites in Section 3.4.5.1, and at page 4-125 (for Site BJM), page 4-349 (for Site DPK), and page 4-1813 (for Site TWR). These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 25: Table ES-2. HAZ-4-MM-1. The EIR should state that for sites BJM, DPK and TWR the construction contractor shall coordinate the completion of the Phase I audit with the Conservancy's Chief of Conservation and provide the Conservancy an opportunity to review the draft audit prior to finalization.

Response to Comment 25: An environmental database records search was conducted for all proposed Project sites as described in Section 3.7.1.1 on page 3-370 of the Draft EIR. As a result of this records search, these three sites were identified as “no concern to encounter recognized environmental



concerns during intrusive site-related activities” as listed in Table 3.7-5 on page 3-373 of the Draft EIR. Therefore, HAZ MM 1 is not required at these sites. No change has been made to the Draft EIR.

Comment 26: Table ES-2. HAZ-8-MM-3. The EIR should state that for sites BJM, DPK and TWR, the draft Fire Management Plan be provided to the Conservancy for its review and comment prior to initiating construction activities

Response to Comment 26: A copy of the draft Fire Management Protection Plan will be provided to the Conservancy for review and comment.

Comment 27: Table ES-2. WQ-1. The EIR should state that for sites BJM, DPK and TWR all stormwater and sediment generated shall be contained with the marked disturbance footprint. For site BJM, unmanaged stormwater from the existing access road to the site is causing serious erosion and damage to the Conservancy's Blackjack Campground Road which must be addressed in order to expand the uses at the BJM site.

Response to Comment 27: During construction, as described in Section 2.0 – Description of Project, on pages 2-36 through 2-38, stormwater and sediment would be controlled through use of Best Management Practices (BMPs). BMPs include evaluation of the site conditions and may include diversion of stormwater from coming on to the project during construction, control of stormwater runoff during construction with use of berms, hay bales, and sand bags, and control of sediment runoff with fiber rolls, hay bales, silt fences, covering of stockpiles, and minimizing exposed areas to the maximum extent possible. Stormwater generated on site will be directed towards existing drainages (manmade or natural). If required, baffle systems such as gravel or rock will be put in place to reduce flow rate of water and help prevent erosion. The design of the facility will include review of stormwater flow to and from the site. Stormwater will be directed towards natural or manmade drainages, and as required, may have baffle systems to reduce flow rate of water to reduce the potential for erosion. Design of the facility will include analysis of stormwater flow across and through the site. Grading of project will incorporate appropriate stormwater management design requirements and will be reviewed and approved by the appropriate agency issuing the building permit.

Comment 28: Table 2.1-1. Dakin Peak is located on Divide Rd.

Response to Comment 28: Table 2.1-1 of the Draft EIR has been revised to indicate the location of the proposed Dakin Peak site on Divide Road. The address for Site DPK on the site summary form in Chapter 4 has also been revised.

Comment 29: Table 2.1-3. Anticipated Construction Activities. It appears that both the DPK and TWR sites would require substantial amounts of cutting and filling to create sufficient space for new or replacement towers. Any fill used will need to certified as weed free. If this is not possible, funds from the interest of an invasive plant control fund will need to be provided in order for the Conservancy to perform invasive plant surveys and/or control at the sites for at least 10 years. The applicable BIO standard should also be modified to reflect this potential invasive introduction.



Response to Comment 29: The level of disturbance associated with project site development at all sites is limited to that analyzed in the EIR, as described in Section 2.1.3, and on a site-specific basis for sites BJM (at page 4-110), DPK (at page 4-335), and TWR (at page 4-1799). The Authority will examine each site based on the site’s unique characteristics and propose the least intrusive installation while still meeting the project’s objectives.

Comment 30: Figure 2.1-3. The proposed new lattice towers at BJM, DPK and TWR will be significantly taller than the existing towers. The current EIR does a cursory analysis of aesthetic and viewsheds effects as well as potential for additional or worse migratory bird fatalities (See general discussion in letter).

Response to Comment 30: See responses to comments #1, #2, and #8 above.

Comment 31: Figure 2.1-4. The typical site plan appears to require substantially more space than is present in the already developed areas at these locations which will require destruction of natural habitat at DPK and TWR, which is not addressed in the EIR.

Response to Comment 31: See response to Comment 28.

Comment 32: Section 2.1.2.1. Emergency Generators. Fuel tanks are very large and given remote locations, secondary containment must be a feature of the BJM, DPK and TWR sites.

Response to Comment 32: As noted at Section 3.7.4.1 and on a site-specific basis (at page 4-131 for Site BJM, page 4-355 for Site DPK, and 4-1819 for Site TWR) of the Draft EIR, the proposed fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented.

Comment 33: Section 2.1.2.1. Lighting. Security lights should be motion sensitive and should not remain on throughout the night. Existing towers at BJM, DPK and TWR have red navigation lights. Cumulative negative effect of additional tower with light was not discussed in EIR.

Response to Comment 33: Tower and security lighting for sites BJM, TPK, and TWR are described in Draft EIR Section 3.1.4.1 (Project Analysis) on page 3-42 under Rural or Remote areas. Cumulative lighting analysis is discussed in Draft EIR Section 3.1.5.3 (Cumulative Impact Analysis) on page 3-45 under AES-4. The Authority concurs that motion sensitive security lighting should be applied at remote sites, including sites BJM, DPK, and TWR. Section 2.1.2.1 will be updated to reflect this new information. These revisions do not result in any changes to the conclusions in the Draft EIR. Based on the analysis methodology developed for the Draft EIR, no other past present or reasonably foreseeable additional projects were noted within 0.25 mile of any of the three sites. Therefore, no cumulative impact from light and glare would occur.

Comment 34: Section 2.6. Alternatives Considered. There is no discussion as to why the existing 100 ft towers cannot be replaced with a single, new, much larger tower that can be instrumented with all



the dishes and antennas required by the existing tower and the LA-RICS LMR system. This option would preserve the existing viewsheds and location aesthetics of a single tower at these locations rather than a two tower approach.

Response to Comment 34: See response to comment #3.

Comment 35: Section 3.1.1. Conservancy lands should be accorded the same "high visual sensitivity" as public lands where the owner/management entity is focused on natural resource protection and protection of scenic resources. The Conservancy's articles of incorporation mandate both of these for Conservancy lands. Under The 1974 Open Space Easement Agreement with Los Angeles County, Conservancy lands are also part of the Los Angeles County parks system.

Response to Comment 35: The Draft EIR *does* identify that the Conservancy lands are an area of high visual sensitivity, as shown in Figure 3.1-1 on page 3-6 and on Table 3.1-1 (page 3-7), where sites BJM, DPK, and TWR are all listed as having high visual sensitivity and being located within a scenic vista, the coastal zone, and adjacent to a regional trail. These sites are also described on page 3-17 under the discussion of the Trans-Catalina Trail, and are listed on page 3-28 as sites located within an area that would be considered a scenic vista.

Comment 36: Table 3.1-1. Regional or municipal park should also be checked for the BJM, DPK and TWR sites.

Response to Comment 36: The Catalina Island Conservancy Open Space Easement has been added in the column for regional or municipal park for these sites in Table 3.1-1 of the Draft EIR. A discussion of the Catalina Island Conservancy Open Space Easement has been added as described in the response to comment 36 below. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 37: Section 3.1.1.3. Trans Catalina Trail. As it is part of Los Angeles County park system's trail network, please delete the "Although it has no official scenic designation."

Response to Comment 37: The text has been deleted in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 38: Section 3.1.1.4. Conservancy lands are Open Space Easement areas in the Los Angeles County park system and should be listed in this section as such.

Response to Comment 38: A discussion of the Catalina Island Conservancy Open Space Easement has been added to Section 3.1.1.4. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 39: Section 3.3.1. Prior to finalizing the EIR, the extensive databases maintained by the Catalina Island Conservancy should be consulted and results included in the EIR (See attached maps). The fall floristic survey performed needs to be supplemented by a spring survey in order to be considered sufficient.



Response to Comment 39: Thank you for offering the Conservancy’s database. Please note that the maps that were attached to the comment letter have been redacted. Botanical surveys, as implemented under BIO MM 24 – Special Status Plant Surveys and Protection, will target any special-status plants that have the potential to occur at the project sites. BIO MM 1, as revised in comment #13, will provide the Conservancy a chance to specify details (e.g., add special-status plants from the Conservancy’s database), prior to finalization of the MMRP. Therefore, qualified botanists will have updated population and location information prior to conducting surveys.

In compliance with BIO MM 24 (page ES-47) surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities in the proper season and in suitable habitat. Surveys would be conducted in the appropriate season and for the appropriate conditions for the given species, as noted in Section 3.1, Special Status Plants (page 3-167),” Each species has specific habitat requirements and a species-appropriate survey period.”

Comment 40: Table 3.1-1. For the BJM, DPK and TWR sites, plant communities within 500 feet of the existing tower include the following: Island Scrub Oak (*Quercus pacifica*) Chaparral, Coastal Sage Scrub, Non-native Grassland.

Response to Comment 40: Table 3.3-1 was revised to add sites BJM, DPK, and TWR to these plant communities. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 41: Table 3.3-3. The following text should be substituted for that in Table 3.3-3: Site BJM is located on the top of Blackjack Peak, the third highest mountain on Catalina Island. North facing slopes of Blackjack are dominated by intact Island scrub oak (*Quercus pacifica*) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). A former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Black jack peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southeast of the peak, and the Airport Road, very popular for motor tours, just to the northwest.

Response to Comment 41: The study area description for Site BJM in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 42: Table 3.3.-3. The plant species list in this table for Blackjack Peak should be as follows (Note all edit species list in Section 4.0 Site Summary Forms. Species not listed here have no records near project site):

The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "*x" within 500 feet):

*Arctostaphylos catalinae**
Atriplex coulteri

Ceanothus megacarpus var. insularis
Crossosoma californicum

Crocانthemum greenei
*Dendromecon harfordii**
Dichondra occidentalis
Dissanthelium californicum
Eriogonum giganteum var. giganteum
Eschscholzia ramosa
Galium catalinense ssp. catalinense
*Galium nuttallii ssp. insulare**
Gilia nevinii

Hordeum intercedens
Jepsonia malvifolia
Lepechinia fragrans
Lyonothamnus floribundus ssp. floribundus
Ophioglossum californicum
Quercus tomentella
Ribes viburnifolium
Scrophularia villosa
Solanum Wallacei

Response to Comment 42: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species has been added into Section 3.3.1.2. . This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 43: Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand Canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Dakin peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.

Response to Comment 43: The study area description for Site DPK in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 44: The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

Arctostaphylos catalinae
Atriplex coulteri
Ceanothus megacarpus var. insularis
Crossosoma californicum
Crocانthemum greenei
Dudleya virens ssp. insularis
*Eriogonum giganteum var. giganteum***
Eschoscholzia ramosa

Hordeum intercedens
Jepsonia malvifolia
Lyonothamnus floribundus ssp. floribundus
Quercus tomentella
Ribes viburnifolium
Scrophularia villosa
Solanum Wallacei

Response to Comment 44: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species will be added into Section 3.3.1.2. This revision does not result in any changes to the conclusions in the Draft EIR.



Comment 45: Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (*Bromus-Avena-Nasella*) and Island Scrub Oak (*Quercus pacifica*) Chaparral. Tower peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Banning Road immediately west of the existing tower.

Response to Comment 45: The study area description for Site TWR in Table 3.3-3 has been revised in accordance with this comment. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 46: The following special status species have records within 1 mile of the project site (those with an "*" within 1000 feet, those with "***" within 500 feet):

Atriplex coulteri
Constancea nevinii
Crossosoma californicum
Cryptantha wigginsii
Deinandra clementina
Dichondra occidentalis
Dissanthelium californicum (1400 feet west of site)
Dudleya virens ssp. hassei
Eriogonum giganteum var. giganteum
Eriogonum grande var. grande
Eschoscholzia ramosa
Galium catalinense ssp. catalinense
Gambelia speciosa
Hordeum intercedens
Jepsonia malvifolia
Lyonothamnus floribundus ssp. floribundus
Pentachaeta lyonii (1400 feet northwest of site)
*Ribes viburnifolium***
Scrophularia villosa

Response to Comment 46: We appreciate the updated plant occurrence data provided in the comment letter. A species list that includes these species will be added into Section 3.3.1.2. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 47: Section 3.3.1.6. Local Policies and Ordinances. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

Response to Comment 47: Refer to response to Comment #10. Additionally, the Authority believes that the proposed project and Mitigation Measures meet and/or exceed those measures outlined in Section 22.46.470 – Flora and Fauna. Relevant subsections of 22.6.470 include Section A, which requires a site plan with a 100 foot buffer of mapped vegetation prepared by a qualified botanist, impact analysis on native vegetation and wildlife, and suggested mitigation measures including transplanting vegetation or revegetating impacted areas; and Section B, preventing development that would remove or damage “rare or endangered plant species” as defined in Appendix G of the 1989 Santa Catalina Island Specific Plan; and G, development within SEAs shall be subject to Title 22 except for the exemption provisions contained in Section 22.56.215. The Authority believes that incorporation of the BIO MM 1, 2, 8, 3, 4, 5, 6, 8, 9, 10, 11, 17, 18, 19, 20, 23, and 24 at all sites on Santa Catalina Island will ensure adherence to Title 22 with regards to biological resources. Additionally, the project will be required to obtain a coastal development permit, and therefore the specific project will be analyzed for adherence to Title 22 and any other land use ordinances of general applicability.

Comment 48: Section 3.3.2.3. Local Regulatory Setting. As discussed above for Sections 3.1.4 and 3.1.5, Catalina Island is part of unincorporated Los Angeles County and subject to land use ordinances of general applicability as well as Title 22, specific to Catalina Island.

Response to Comment 48: Refer to responses to Comments #10 and #44 above.

Comment 49: Table 3.3-7. Species with Suitable Habitat within Study Areas. The following should be added to this table:

Burrowing Owl: BJM, DPK, TWR

California Mountain Kingsnake: BJM

Response to Comment 49: Table 3.3-7 has been revised to add the sites for these species. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 50: Section 3.3.4.1, Page 3-147 4th full paragraph and 3-148 first full paragraph. Burrowing owls are frequently observed throughout Catalina Island and should be listed for the BJM, DPK and TWR sites.



Response to Comment 50: The presence of burrowing owls at sites BJM, DPK, and TWR has been added to the text in the 4th full paragraph on page 3-147 and in the first paragraph on page 3-148. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 51: Section 3.3.4.1, Pages 3-154 to 3-155. Santa Catalina Island Fox. The following changes should be made:

1st Paragraph, 1st Sentence should state: "The Santa Catalina Island Fox is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development."

1st Paragraph, last sentence should state: "Young can be born any time from late February through late April..."

2nd Paragraph, should state: "The major threat to Catalina Island Foxes have been disease outbreaks, e.g. the canine distemper outbreak in the late 1990s that almost wiped out the population, and mortality from vehicle collisions or other dangers associated with human development, e.g. drowning in open containers of liquids, poisoning, becoming trapped in open excavations. Catalina Island Foxes should be expected at all three Catalina Island project sites and should definitely expected to investigate any changes to the sites during active construction, especially open holes and trenches, open containers of liquids and improperly enclosed solid or food wastes.,'

3rd Paragraph, Construction impacts should read: The noise and activities associated with construction of the proposed Project sites could result in temporary disturbance of fox. Therefore, construction cannot be initiated from late February the end July. Foraging foxes will investigate the construction site for new food sources and for cover in uncovered excavations, under equipment or stored materials. Discarded food and trash is effectively an attractive nuisance for foxes and can result in increased habituation and dependence on humans for food."

Response to Comment 51: Revisions were made to the 1st and 2nd paragraphs in accordance with the comment. These revisions do not result in any changes to the conclusions in the Draft EIR. Regarding the comment to the 3rd paragraph, since BIO MM 20 part b) includes the inspection for fox dens within the project area and within an additional 250 foot buffer, and that construction activities will be stopped and USFWS and CDFW contacted if a den is found, there is no additional need for a seasonal restriction. No change to text has been made.

Comment 52: BIO-MM-19(e). Add the following: "Any trenches, holes or other excavations that are not covered at the end of the work day, must be provided with a fox escape ramp."

Response to Comment 52: See response to Comment #17.

Comment 53: BIO-MM-20(a). Add the following: "Crews should be informed that there is absolutely no feeding of foxes allowed on Catalina Island."



Response to Comment 53: In compliance with BIO MM 20, Santa Catalina Island Fox Protection, construction crews will be informed on measures to avoid impacts to the fox, including no feeding. No change has been made to BIO MM 20.

Comment 54: Section 3.3.4.1, Pages 3-157 to 3-158. Small Animals, California Mountain Kingsnake, Coast Horned Lizard, San Diego Woodrat, Tehachapi Pocket Mouse, Townsend's Big-eared Bat and Western Mastiff Bat. The Conservancy has documentation of California Mountain Kingsnake at nearby Blackjack Campground. Townsend's Big-eared Bats breed on Catalina Island in caves and abandoned mines.

Response to Comment 54: Site BJM has been added for the discussion of California mountain kingsnake, and sites DPK and TWR have been added to the discussion of Townsend's big-eared bat in the paragraphs indicated on pages 3-157 and 3-158. These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 55: Section 3.3.4.1., Pages 3-158 and 3-159. BJM should be added to the list of sites at the top of page 3-158, in the fourth full paragraph of page 3-158, and in the first full paragraph on page 3-159.

Response to Comment 55: Site BJM has been added to the paragraphs indicated on pages 3-158 and 3-159. This revision does not result in any changes to the conclusions in the Draft EIR.

Comment 56: Section 3.3.4.1, Page 3-169. BIO-MM-23(b). Add the following: "For sites BJM, DPK and TWR, all construction vehicles and equipment shall be washed prior to being brought to Catalina Island and shall not enter Conservancy property until it is inspected by the Conservancy's invasive Plant Program Manager.

Response to Comment 56: See response to Comment #22.

Comment 57: Section 3.3.4.1, Page 3-207. See earlier comment regarding reference to Title 22 regulations.

Response to Comment 57: The authority acknowledges the project must adhere to Title 22, which will occur during the coastal plan permitting phase. See response to Comments #10 and #44.

Comment 58: Table 3.3-12. Special Status Species. The following species should be added to this table for Sites BJM, DPK and TWR:

- Burrowing Owl**
- Island Loggerhead Shrike**
- Catalina Island Quail**
- San Clemente Spotted Towhee**
- Hutton's Vireo**

In addition, the consultant should refer to Appendix G of the LCP for other species of special concern regulated under Title 22 of the LA County Code.

Response to Comment 58: The bird species listed in the comment have been added to the species list for sites BJM, DPK, and TWR in Table 3.3-12. These revisions do not result in any changes to the conclusions in the Draft EIR.

Thank you for providing the reference to the list of rare Catalina Island native plants, referred to in your comment as Appendix G of the LCP (http://planning.lacounty.gov/assets/upl/data/pd_santa-catalina-island-implementation.pdf). A species list that includes these species will be added into Section 3.3.1.2. Appendix G was reviewed and these plant species were also included in this revised list. This revision does not result in any changes to the conclusions in the Draft EIR.

In accordance with established mitigation measures, impacts to native vegetation will be minimized with the application of BIO MM 9 (page ES-40), and special status plants will be protected with the application of BIO MM 24 (page ES-47). A comprehensive inventory of plant species will be conducted at each project site where project activities would result in ground disturbance. Any special status plant species found on site will be identified for protection.

Comment 59: Section 3.4. Cultural Resources. Extensive prehistoric and historic cultural resources are present nearly everywhere on Catalina Island. Human habitation and use of the island extends at least to 8,000 BP and likely much earlier. Any excavation or drilling, even in previously developed areas, should expect to encounter cultural artifacts, human remains, middens, lithic scatters, and/or habitation sites. All three Catalina Island sites have mapped cultural locations in or near the project location (see attached maps). No excavation or soil disturbance should be undertaken without an archeological monitor present. All of the tables and text in Section 3.4 should be edited to include BJM, DPK and TWR as actual or likely locations for cultural resources to be present.

Response to Comment 59: Please note that the maps that were attached to the comment letter have been redacted. Protocols for the identification of prehistoric and historic archaeological resources included records searches; a review of site records, site maps, and archaeological survey reports; GIS mapping; and field surveys of all Project sites, including BJM, DPK, and TWR. Although Santa Catalina Island is known to have a long history of human habitation, based on the identification protocols, there were no prehistoric or historic archaeological sites, features, or other remains that would be impacted by Project activities identified within the proposed ground disturbing areas at sites BJM, DPK, or TWR. Within a 0.5-mile radius of Site BJM, one prehistoric site was noted approximately 0.21 mile to the north. Within a 0.5-mile radius of Site DPK, one prehistoric site (a single artifact) was noted approximately 0.23 mile to the southwest; and one historic site (two concrete water line markers) was noted approximately 0.12 mile to the northeast. No prehistoric or historic archaeological remains were found within 0.5-mile radius of Site TWR. None of the identified archeological remains were recorded as being historical resources as defined in California PRC section 21084.1 and CEQA Guidelines Section 15064.5(a) – i.e., listed in, or eligible for listing in the California Register of Historical Resources.



However, to address the concerns of the Conservancy, an archaeological monitor will be present during all ground-disturbing activities at sites BJM, DPK, and TWR.

These revisions do not result in any changes to the conclusions in the Draft EIR.

Comment 60: Section 4.0. Site Summary Forms. -- All site summary forms for BJM, DPK and TWR should be thoroughly edited to reflect changes discussed above.

Response to Comment 60: Site summary forms for BJM, DPK and TWR have been edited for consistency with the revisions described in previous responses.



Comment Letter Public 1

February 19, 2016

To whom it may concern,

1 I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

2 We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

3 There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

4 In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel placed buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

5 If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

AR ALEX ARHENDARIZ / DANIEL BAYER
ARHENDARIZ-BAYER HOUSEHOLD

RECEIVED
FEB 25 2016
LA-RICS *JH*

2361 STANLEY Signal Hill CA 90755



Responses to Comment Letter Public 1

The Authority appreciates your comments on the Draft EIR dated February 19, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

Response to Comment 1: Your opposition to the use of Site SGH is noted.

Comment 2: We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

Response to Comment 2: The total number of potential locations considered for the LMR project is 94. Information on the numbers of sites that was provided during public meetings and community outreach meetings is consistent with the information in the Draft EIR. While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as SDW and WAD, are similar to site SGH in that they are located in residential areas with residences adjacent. Regarding the comment that there was a lack of public disclosure, the Draft EIR was circulated for a 45 day public review period. The Draft EIR explains that the Authority is proposing installation of up to 40 whip and up to 9 microwave antennas on an existing 160-foot tower, which would be extended to 180 feet, with an additional 15 foot lighting rod. (Draft EIR, pp. 2-32, 4-1487.) Regarding the comment on “radiation fields,” please see response to comment 3, below.

Comment 3: There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

Response to Comment 3: As described in Section 5.3 of the Draft EIR, the Authority will manage radiofrequency (RF) electromagnetic energy (EME) radiation in accordance with applicable guidance



found at the Federal Communication Commission’s Office of Engineering and Technology (OET) Bulletin 65. This will include desktop analysis of RF exposures inclusive of all equipment at the site (including new LMR equipment) prior to construction and confirmatory sampling of RF exposures upon completion of construction to ensure exposures are within regulatory requirements for workers and the public. The assessments from the different health and safety organizations seem to be different on how they classify RF EME field. See the below FCC web link: <https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/general/rf>. However RF-EME is classified by the different health and safety organizations, per information on <https://www.fcc.gov/general/radio-frequency-safety-0>, “...the FCC has continuously monitored research and conferred with experts in this field, and is confident in its RF exposure guidelines and the soundness of the basis for its rules”, the FCC guideline is still current and valid. It is unclear whether any organization besides the FCC has established new safety guidelines, nor is there any evidence that RF exposure is harmful at the levels that would occur with the proposed project.

Comment 4: In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

Response to Comment 4: The proposed 1,500 gallon diesel storage tank would be an aboveground, double-walled belly tank on the 85-KW diesel generator, not a buried underground storage tank. The diesel storage tank would be installed in accordance with all federal, state and local regulations, and the California Fire Code as discussed in Section 3.7 of the Draft EIR, with specific detail for Site SGH at pages 4-1508 and 4-1509. The regulations are promulgated to ensure diesel storage tanks are safely constructed and include secondary spill control containment requirements to prevent leaks into the environment. Also, for facilities that have a fuel tank greater than 660 gallons or fuel storage greater than 1,320 gallons, a Spill Prevention, Control and Countermeasures Plan (SPCC Plan) will be prepared and kept on site. Management of fuels will be conducted in accordance with all applicable regulations.

Signal Hill is bounded by a fault system. According to the California Geologic Special Studies Zones, Long Beach Quadrangle, the active fault trace is located near the bottom of Signal Hill, approximately 1/8 mile from the site, but the site is not within an Alquist-Priolo Fault Zone. However significant shaking would occur at the site should an earthquake rupture along the active fault trace. A discussion of geologic hazards at the site is provided on page 4-1504 of the Draft EIR. The storage tank would be installed in compliance with the local building codes to minimize seismic hazards (page 3-349 of DEIR).

Noise levels associated with the period operation of the diesel generator, estimated to be one hour per month as part of routine maintenance, and as required in the event of power outage. Section 4, page 4-1518 of the Draft EIR provides a detailed analysis of noise from the period use of the generator. The Draft EIR concludes that “resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet.



Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding this occasional operational noise to ambient conditions would fall far below the daytime (90 dBA) or nighttime (80 dBA) thresholds identified by the Federal Transit Authority used in the analysis. The more continuous noise associated with the air conditioning unit used to regulate temperature in the equipment shelters would fall within background noise levels; therefore, impacts from operational noise would be less than significant.”

Comment 5: If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Response to Comment 5: As lead agency and proponent of the project, the Authority has and will continue to perform outreach with the public regarding LMR project implementation. The Authority is fully accountable for the decisions being made regarding the implementation of LMR Project. The Authority’s Board will consider the Draft EIR and Final EIR, inclusive of your comments, prior to making a decision on the proposed project. The LMR system would provide emergency responders with an improved communications system that will enable efficient and coordinated response to incidents and emergencies that is currently not possible in Los Angeles County. The improved communications could reduce response times and ultimately save lives. The LMR system would support faster, better-coordinated, large-scale multi-agency response to emergencies such as terrorist attacks, earthquakes, civil disturbance, wildfire or other disasters, improving overall system capacity and coverage for first and second responders region-wide. The LMR project would enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists.

The DEIR fully discloses the project and potential project impacts based on the best available information at the time it was released for public review. The form letter that you note in your comment was likely the Notice of Availability (NOA). The NOA was provided to you in accordance with Section 21092 of the California Public Resources Code. The NOA included: Project Description and Location; Significant Anticipated Environmental Effects; Hazardous Waste Sites; Document Availability (including both the Website for electronic review and 16 locations for where hard copies of the document could be reviewed) and Public Review and Meetings (which included location and time for six public hearings and both e-mail and physical address for submitting public comments). A total of six public meetings were held for the Draft EIR: one in each of the five districts of the Los Angeles County Board of Supervisors, plus one in Avalon on Catalina Island. The nearest location of a public meeting for the Draft EIR to the site in Signal Hill was approximately 12 miles from the site at Peck Park Community Center Auditorium at 560 N. Western Ave. in San Pedro. The project spans all of the Los Angeles County area, and the Authority selected locations that would provide opportunities for people all across the county to attend



a public meeting if desired. The format and information provided at each of the public meetings was the same.

The Draft EIR included all pertinent details of the proposed project at Site SGH. As described in the Draft EIR on page 2-32, Site SGH is an “Existing 160’ tower to be extended to 180’.” As described in more detail beginning at page 4-1487, Site SGH describes installation of up to 40 whip and up to 9 microwave antennas on existing 160-foot lattice tower to be extended to 180 feet tall, with additional up to 15-foot lightning rod.



Comment Letter Public 2

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Willie B Armstead
WILLIE B ARMSTEAD

RECEIVED

FEB 26 2016

LA-RICS

2525 EAST Wind Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 3

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

S. C. Brainard
2312 PROMONTORY DR.
SIGNAL HILL, CA - 90755



Please see response to comment letter Public 1



Comment Letter Public 4

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

[Handwritten signature]
RAULPH CAUDINO

RECEIVED

FEB 25 2016

LA-RICS

2301 STANLEY Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 5

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

A handwritten signature in black ink that reads "Carey Clements".

Carey Clements

RECEIVED

FEB 25 2016

LA-RICS

2541 EAST Wind Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 6

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2301 Promontory Drive
Signal Hill, CA 90755

Woody Chen



Please see response to comment letter Public 1



Comment Letter Public 7

February 19, 2016

To whom it may concern,


I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

JOSEPH COLLINS JR
2/22/2016
2239 STARLIGHT LANE
SIGNAL HILL, CA 90757

Please see response to comment letter Public 1



Comment Letter Public 8

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Janet Cree
2337 Promontory Dr.
Signal Hill, CA. 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 9

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

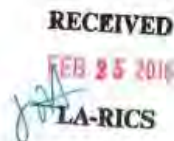
There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,


Leslie Dew
2380 Stanley Ave



Please see response to comment letter Public 1



Comment Letter Public 10

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Walter H. Ferrell
Walter H. Ferrell
2329 Promontory Dr
Signal Hill, Ca 90755
562-961-9155

Please see response to comment letter Public 1



Comment Letter Public 11

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,



Jason Ferrera-Garcia

2501 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 12

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


RECEIVED
FEB 26 2016
LA-RICS
NADY Hebish
2209 West Windway
Signal Hill CA 90755
(562) 889-2109

Please see response to comment letter Public 1



Comment Letter Public 13

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Patrick Heeb
PATRICK HEEB

RECEIVED

FEB 25 2016

LA-RICS

2599 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 14

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Reid Jones



2509 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 15

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

IKONITA S JOY MD 2/22/2016 2239 STARBUCK LANE SIGNAL HILL, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 16

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Diane Kerr
2357 Promontory Dr
Signal Hill 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 17

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jonathan Kent
2357 Promontory
Signal Hill 90755



Please see response to comment letter Public 1



Comment Letter Public 18

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

SOPHAN KHEM

2210 WESTWIND WAY
SIGNAL HILL, CA 90255

RECEIVED

FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 19

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Sara Lamee
2349 Promontory Dr. Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 20

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

2561 Hillcrest ST Signal Hill CA 90755



Please see response to comment letter Public 1



Comment Letter Public 21

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

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Sincerely,

Grant Laver
2293 Westwind Way

RECEIVED

FEB 26 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 22

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel placed buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Signed: 

Dated: FEB 23 2016

By: Tony Lim

Address: 2273 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 23

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

Michael D. Loomis
MICHAEL D. LOOMIS

RECEIVED
FEB 26 2016
LA-RICS

2331 Stanley Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 24

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

A handwritten signature in black ink that reads "Jan Lu".

A rectangular stamp with the word "RECEIVED" in bold black letters at the top. Below it, the date "FEB 25 2016" is stamped in red. At the bottom, "LA-RICS" is stamped in black, with a handwritten "JA" in blue ink to the right.

2320 STANLEY SIGNAL HILL CA 90755

Please see response to comment letter Public 1



Comment Letter Public 25

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

Quinn McCutchan
JMcCutchan
Jame Quintan
JQuin

RECEIVED
FEB 25 2016
LA-RICS JMA

2330 Stanley Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 26

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Catherine Olweg
2365 Promontory Drive
Signal Hill CA 90755

RECEIVED
FEB 25 2016
LA-RICS 

Please see response to comment letter Public 1



Comment Letter Public 27

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

Melissa Rosenthal / Melissa Rosenthal
2245 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 28

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

X *Jawad SHAHID*
2217 West Windway
Signal Hill CA 90755
(562) 494-2587



Please see response to comment letter Public 1



Comment Letter Public 29

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

Linda Simmons
2255 Westwind Way
Signal Hill, Ca 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 30

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters, and ~~ANTENNAS~~ ANTENNAS

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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Sincerely,

2255 WESTWIND WAY

SIGNAL HILL, CALIF 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 31

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


Martha A. Steere

RECEIVED

FEB 25 2016

JAA LA-RICS

2533 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 32

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jose F. Torreblanca
2277 Starlight Ln
Signal Hill CA 90755

Kira Torreblanca



Please see response to comment letter Public 1



Comment Letter Public 33

In reference to proposed Signal Hill site

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Donnie Vega
2325 promontory Dr
SH CA 90255

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 34

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel place buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Albert V. Warot
Jwarot

2305 Promontory Dr
Signal Hill Ca 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 35

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

RECEIVED

FEB 16 2016

LA-RICS

2489 EASTWIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 36

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.


We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


John A. Bennett

RECEIVED

FEB 25 2016

LA-RICS 

2499 EAST WIND Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 37

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

RECEIVED

FEB 25 2016

LA-RICS

2501 Hillcrest Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 38

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,


2511 Hillcrest St
Signal Hill CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 39

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

Jim Kelly
2521 Hillcrest Signal Hill CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 40

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

RECEIVED
FEB 25 2016
LA-RICS

2530 Hillcrest ST Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 41

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2541 Hillcrest Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 42

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

2580 Hillcrest St Signal Hill, CA 90755

RECEIVED

FEB 25 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 43

February 19, 2016

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Sincerely,

2591 Hillcrest St Signal Hill CA 90755
Diana Bonar 2/21/15



Please see response to comment letter Public 1



Comment Letter Public 44

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely, *Gilbert B. Gmejt*
2013 Promontory Dr.
Signal Hill, Ca, 90755

RECEIVED
FEB 26 2016
LA-RICS *[Signature]*

Please see response to comment letter Public 1



Comment Letter Public 45

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

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Sincerely,

[Handwritten signature]
2304 Promontory Drive
Signal Hill

RECEIVED
FEB 26 2016
LA-RICS *[Handwritten initials]*

Please see response to comment letter Public 1



Comment Letter Public 46

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know", But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

In addition, there is talk about placing a 1,500 gallon diesel storage tank to power a new 85 KW generator to power the antennas in case of a power failure. This is a bad idea. On every home sale, a natural hazards report is released and underground storage tanks and leaks could impact the values and desirability of nearby homes. Signal Hill is on an earthquake fault line and we do not need thousands of gallons of fuel placed buried in our soil. The generator may also create a lot of noise that would be a nuisance to neighboring homes.

If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,


2313 Promontory Dr. SH CA 90755

RECEIVED

FEB 23 2016

LA-RICS

Please see response to comment letter Public 1



Comment Letter Public 47

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in black ink, followed by the address "2336 Promontory Drive Signal Hill, CA 90755" written in blue ink.

2336 Promontory Drive
Signal Hill, CA 90755



Please see response to comment letter Public 1



Comment Letter Public 48

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in blue ink, appearing to be "John Doe".

2377 Promontory Dr.
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Handwritten initials in blue ink, possibly "JD".

Please see response to comment letter Public 1



Comment Letter Public 49

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

2377 PROMONTORY DRIVE.
Signal Hill CA 90755.

Tea Chua
Yvonne Chong
[Handwritten signatures]

Please see response to comment letter Public 1



Comment Letter Public 50

February 19, 2016

To whom it may concern,

I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

RECEIVED

FEB 25 2016

LA-RICS

2341 STANLEY Signal Hill CA 90755

Please see response to comment letter Public 1



Comment Letter Public 51

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

Aviel Zaemel

*2229 Westwind way
Signal Hill, CA 90755*

RECEIVED

FEB 25 2016

LA-RICS *JA*

Please see response to comment letter Public 1



Comment Letter Public 52

February 19, 2016

To whom it may concern,

I live in Promontory Crest in Signal Hill and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas. Many residents have talked about raising money for a class action lawsuit, but we are confident that if we get our voices heard that all parties will realize that increasing the radiation field in a residential neighborhood is not the right thing to do. We have hundreds of condos nearby and numerous million dollar homes that have an interest in making sure the antenna tower does not grow.

There have been nine cases of cancer on our street and two cancer related deaths. The safety guidelines for the amount of allowable RF are based on what we "know". But I would venture to guess, there is much more that we don't know about RF than what we do know. Simply following the safety guidelines does not ensure safety for our residents. It wasn't that long ago that smoking was considered safe. RF causes cancer and kills people. There is no justification to add harmful radiation to a residential neighborhood, especially when there are nearly a hundred other sites to choose from.

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If this project moves forward, there will be an outpouring of support to hold the decision makers accountable for harming our quality of life. LA-RICS has engaged in obfuscating the truth from the public. We received a form letter from LA-RICS, which did not explain the scope of the project. Instead it directed the public to a 3,200 page document and buried inside were the pertinent details of the antenna growing by leaps and bounds. In addition, the public meetings were very far away from the proposed site and in one case, we'd have to hop on a boat to have our voices heard. I urge you to take our complaint seriously. Once everyone knows the truth about this proposal you will have hundreds of very angry families who will do everything to stop you from pulling a Porter Ranch on us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg M. H."
2240 Westwind Way
Signal Hill, CA 90755

RECEIVED
FEB 26 2016
LA-RICS

Please see response to comment letter Public 1.



Comment Letter Public 53

February 23, 2016

To whom it may concern,

1 | I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

2 | We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas.

Sincerely,

Shan Fernando

2311 Stanley Ave, Signal Hill, CA 90755

Responses to Comment Letter Public 53

The Authority appreciates your comments on the Draft EIR dated February 23, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: I live in Promontory Crest and within our gated community is an antenna tower, just a few feet away from many of the homes. I vehemently oppose any extension to this antenna tower and any placement of additional radio transmitters.

Response to Comment 1: The commenter’s opposition to the use of Site SGH is noted.

Comment 2: We were told by LA-RICS officials that our site is unique in that it is the only proposed location out of 92 sites that is surrounded by a residential neighborhood. The antenna tower was here first; however, there was no public disclosure that the antenna tower could grow by 35 feet and could grow up to 49 additional antennas.

Response to Comment 2: While each LMR site included in the Draft EIR is unique, other sites analyzed in the Draft EIR, such as sites SDW and WAD, are similar to Site SGH in that they are located in residential areas with residences adjacent. Regarding the comment that there was a lack of public disclosure, the Draft EIR was circulated for a 45 day public review period. The Draft EIR explains that the Authority is proposing installation of up to 40 whip and up to 9 microwave antennas on an existing 160-foot tower, which would be extended to 180 feet, with an additional 15 foot lighting rod. (Draft EIR, pp. 2-32, 4-1487.)



Comment Letter Public 54

February 12, 2016

Regarding Proposed LMR Site
in Signal Hill.

To whom it may concern,

1 | We are outraged at the proposal to extend the radio antenna tower by an additional 20 feet and install a new 15 foot lighting rod on top of it. There are hundreds of homes and condos nearby that would be adversely affected. We have children growing up in the neighborhood and we do not want to be bombarded by additional radiation.

2 | As homeowners, all of us signed disclosures acknowledging the existence of the radio tower. What was never disclosed to any of us was that the radio tower could grow by 35 feet. That is the size of a school bus planted vertically on top of the antenna. That is a big deal. That is unacceptable and that is something you would not allow in your backyard. From my understanding, it would be illegal to build the antenna after the homes were already here, so I do not see how increasing the size and scope of the existing antenna is legal.

3 | If every home went down in value by \$25,000 as a result of the antenna tower's giant growth, we are talking about tens of millions of dollars of damages to the local real estate market. Not only does increasing the size of the antenna impact home values, it does additional damage to property values because now homeowners would have to disclose that the antenna was increased in size by 35 feet and it could happen again in the future. The precedent of growing the antenna by leaps and bounds at any time would further depreciate property values for hundreds of property owners.

4 | Notice of the initiative was sent out to the neighbors; however, nowhere in the notice does it mention that the antenna will grow by 35 feet. That's disingenuous and obfuscating the truth. It is also inappropriate and manipulative to hold six public meetings regarding the impact of the antenna and not one of these public meetings held by the LA-RICS is taking place near the proposed site, where the health of the families will be affected. We would literally have to get on a boat to get to the February 1st meeting on Catalina Island.

5 | If this proposal passes, I will personally send out thousands of postcards to the nearby residents to hold the decision makers accountable for endangering our health and damaging our property values.

Sincerely,

Matthew Simmons
(562) 546-2277
2245 Westwind Way
Signal Hill, Ca 90755

RECEIVED

FEB 25 2016

LA-RICS



Responses to Comment Letter Public 54

The Authority appreciates your comments on the Draft EIR dated February 12, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: We are outraged at the proposal to extend the radio antenna tower by an additional 20 feet and install a new 15 foot lighting rod on top of it. There are hundreds of homes and condos nearby that would be adversely affected. We have children growing up in the neighborhood and we do not want to be bombarded by additional radiation.

Response to Comment 1: The commenter's concerns regarding increasing the height of the existing tower at Site SGH are noted and will be reviewed by the LA-RICS Joint Powers Authority Board of Directors prior to their consideration of the project, and made a part of the administrative record for this project. The management of radiofrequency exposures at the site would be conducted, as noted in the Draft EIR at Section 5.3 (page 5-8), in accordance with applicable regulations and guidelines.

Comment 2: As homeowners, all of us signed disclosures acknowledging the existence of the radio tower. What was never disclosed to any of us was that the radio tower could grow by 35 feet. That is the size of a school bus planted vertically on top of the antenna. That is a big deal. That is unacceptable and that is something you would not allow in your backyard. From my understanding, it would be illegal to build the antenna after the homes were already here, so I do not see how increasing the size and scope of the existing antenna is legal.

Response to Comment 2: The Authority's proposal for Site SGH is to extend the existing 160-foot lattice tower by 20 feet to 180 feet. A 15-foot lightning rod would be installed on the top of the extended tower. The tower would not be extended by 35 feet. The commenter's opposition to the proposed project at Site SGH is noted. The commenter's comment regarding the legality of building antenna is not an environmental issue that requires a response pursuant to CEQA Guidelines section 15088 and is outside the scope of the EIR.

Comment 3: If every home went down in value by \$25,000 as a result of the antenna tower's giant growth, we are talking about tens of millions of dollars of damages to the local real estate market. Not only does increasing the size of the antenna impact home values, it does additional damage to property values because now homeowners would have to disclose that the antenna was increased in size by 35 feet and it could happen again in the future. The precedent of growing the antenna by leaps and bounds at any time would further depreciate property values for hundreds of property owners.

Response to Comment 3: CEQA does not require social or economic impacts to be treated as significant effects on the environment (CEQA Guidelines §§ 15064(e), 15382). Additionally, there is no evidence that the proposed project would have any impact on property values near Site SGH, or that any potential change in property value would result in a physical impact on the environment.



Comment 4: Notice of the initiative was sent out to the neighbors; however, nowhere in the notice does it mention that the antenna will grow by 35 feet. That's disingenuous and obfuscating the truth. It is also inappropriate and manipulative to hold six public meetings regarding the impact of the antenna and not one of these public meetings held by the LA-RICS is taking place near the proposed site, where the health of the families will be affected. We would literally have to get on a boat to get to the February 1st meeting on Catalina Island.

Response to Comment 4: As lead agency and proponent of the project, the Authority has and will continue to perform outreach with the public regarding LMR project implementation. The Authority is fully accountable for the decisions being made regarding the implementation of LMR Project. The Authority's Board will consider the Draft EIR and Final EIR, inclusive of comments received, prior to making a decision on the proposed project. The LMR system would provide emergency responders with an improved communications system that will enable efficient and coordinated response to incidents and emergencies that is currently not possible in Los Angeles County. The improved communications could reduce response times and ultimately save lives. The LMR system would support faster, better-coordinated, large-scale multi-agency response to emergencies such as terrorist attacks, earthquakes, civil disturbance, wildfire or other disasters, improving overall system capacity and coverage for first and second responders region-wide. The LMR project would enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists.

The Draft EIR fully discloses the project and potential project impacts based on the best available information at the time it was released for public review. The notice identified in the comment was likely the Notice of Availability (NOA). The NOA was provided to you in accordance with Section 21092 of the California Public Resources Code. The NOA included: Project Description and Location; Significant Anticipated Environmental Effects; Hazardous Waste Sites; Document Availability (including both the Website for electronic review and 16 locations for where hard copies of the document could be reviewed) and Public Review and Meetings (which included location and time for 6 public hearings and both e-mail and physical address for submitting public comments). A total of six public meetings were held for the Draft EIR: one in each of the five districts of the Los Angeles County Board of Supervisors, plus one in Avalon on Santa Catalina Island. The nearest location of a public meeting for the Draft EIR to the site in Signal Hill was approximately 12 miles from the site at Peck Park Community Center Auditorium at 560 N. Western Ave. in San Pedro. The project spans all of the Los Angeles County area and the Authority selected locations that would provide opportunities for people all across the county to attend a public meeting if desired. The format and information provided at each of the public meetings was the same.

The Draft EIR included all pertinent details of the proposed project at Site SGH. As described in the Draft EIR on page 2-32, Site SGH is an "Existing 160' tower to be extended to 180'". As described in more detail beginning at page 4-1487, Site SGH describes installation of up to 40 whip and up to 9 microwave antennas on existing 160 foot lattice tower to be extended to 180 feet tall, with additional up to 15 foot lightning rod.



Comment 5: If this proposal passes, I will personally send out thousands of postcards to the nearby residents to hold the decision makers accountable for endangering our health and damaging our property values.

Response to Comment 5. The commenter’s concerns are noted.



Comment Letter Public 55

From: Ebrahim Yedidsion
Sent: Thursday, February 25, 2016 11:07:39 AM (UTC-08:00) Pacific Time (US & Canada)
To: DraftEIR Hotline
Subject: LMR Site in 409 Walker Drive, Beverly Hills, Ca. 90210

- 1 | We hereby oppose to installation of additional Towers at this location due to known health risk hazard to residents who live close to such sites .
- 2 | There are already TWO (2) communication towers at this address and adding another, will surely intensify the risk and hazard to health by factor of 75%. Why not share and use the existing towers?
- 3 | The studies made by various countries and independent institution show very high health risk to close residence even at radiations of 100 times less that what is being proposed. (please refer to attachments).
- 4 | Who and which organization is going to accept liability and be responsible for the short and long term well being of the immediate residents? Have any one of the studies presented in this (EIR) been done by independent contractors with no connection what so ever to beneficiaries?
- 5 | Has there been any study to evaluate the effect of these towers on the value of the properties close to this specific site?? Who or which organization is going to compensate the property owners for such losses.

Awaiting for your formal response.

Respectfully,

Abe Yedidsion
1890 Loma Vista Drive
Beverly Hills, Ca 90210

Cell: (310)938-9933

References:

<http://chej.org/wp-content/uploads/Cell-Phone-Towers-PUB-1291.pdf>

<http://healthycanadians.gc.ca/security-securite/radiation/devices-dispositifs/consumer-consommateur/cell-eng.php>

<https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety#Q5>

<http://www.geoengineeringwatch.org/health-effects-from-cell-phone-tower-radiation/>

<http://nstarzone.com/CELL.html>

<http://www.saferemr.com/2015/04/cell-tower-health-effects.html>



Responses to Comment Letter Public 55

The Authority appreciates your comments on the Draft EIR dated February 25, 2016. The comments will be provided to the LA-RICS Authority Board when the EIR is considered for certification.

Responses to the comments are provided below.

Comment 1: We hereby oppose to installation of additional Towers at this location due to known health risk hazard to residents who live close to such sites.

Response to Comment 1: The Authority acknowledges the commenter's opposition to the installation of additional towers at the proposed Walker Drive site (WAD). As the Draft EIR explains on page 4-1874, the proposed project would utilize an existing monopole at site WAD, which would be increased from its current height of 120 feet to 140 feet. No new tower(s) is proposed for this location.

Comment 2: There are already TWO (2) communication towers at this address and adding another, will surely intensify the risk and hazard to health by factor of 75%. Why not share and use the existing towers?

Response to Comment 2: The commenter is correct regarding the number of existing towers (a lattice tower and monopole currently exist at Site WAD). The Draft EIR includes a site-specific analysis of the potential for exposure to hazardous conditions at Site WAD on pages 4-1895 through 4-1898. The Draft EIR also includes a discussion of Radio Frequency (RF) exposures in Section 5.3. As explained there, RF exposures from operation of each site are not permitted to exceed the maximum permissible exposure (MPE) standards established by the FCC as set forth in 47 CFR Sections 1.1307 and 1.1310, and expressed in FCC OET Bulletin 65. To comply with this legal standard at each operational site, the Authority will require its contractor to perform an RF emission safety study prior to construction that will model the RF emission level from all equipment on site and demonstrate that it complies with the FCC guidelines and regulations on MPE for the General Public / Uncontrolled and for the Occupational / Controlled groups per the FCC's OET Bulletin 65. After installation of the proposed Project site equipment and prior to operation, the contractor will conduct field measurements to confirm RF emission levels are in compliance and will identify, resolve, and correct any noncompliance (including posting appropriate signage) until compliance can be demonstrated. Radiofrequency exposures at proposed LMR project sites would be managed in accordance with applicable regulations contained in OET Bulletin 65.

There is no evidence that the proposed project would intensify health hazards. Additionally, as discussed above, the proposed project would use an existing tower at Site WAD, as the commenter suggests.

Comment 3: The studies made by various countries and independent institution show very high health risk to close residence even at radiations of 100 times less that what is being proposed. (please refer to attachments.)



Response to Comment 3: The Authority has reviewed the referenced six web sites. The information and related references do not contain any evidence that would compel the Authority to revise the discussion of radio frequency emissions in the Draft EIR. The Authority will continue to follow the underlying guidance provided by the FCC (i.e., FCC OET Bulletin 65) as the accepted and authoritative guidance used for management of RF-EME, as documented in the Draft EIR. No information applicable to the analysis in the Draft EIR that would result in a change to the conclusions of the Draft EIR was identified.

Comment 4: Who and which organization is going to accept liability and be responsible for the short and long term wellbeing of the immediate residents? Have any one of the studies presented in this (EIR) been done by independent contractors with no connection what so ever to beneficiaries?

Response to Comment 4: The EIR, and all reports prepared in connection with the EIR, reflect the independent judgment of the Authority and have been prepared in compliance with CEQA.

Comment 5: Has there been any study to evaluate the effect of these towers on the value of the properties close to this specific site?? Who or which organization is going to compensate the property owners for such losses?

Response to Comment 5: CEQA does not require social or economic impacts to be treated as significant effects on the environment. (CEQA Guidelines §§ 15064(e), 15382.) Additionally, there is no evidence that the proposed project would have any impact on property values near Site WAD, or that any potential change in property value would result in a physical impact on the environment.



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4.0 Revisions to the Draft EIR

This chapter presents specific changes to the Draft EIR made in response to written comments received from the public and/or reviewing agencies. Text in blue underline (i.e., blue underline) represents language that has been added to the EIR; text in red strikethrough (i.e., ~~red strikethrough~~) has been deleted from the EIR.



Page ES-36; Table ES-2: Environmental Impacts and Mitigation Measures

The text of BIO MM 1, BIO MM 2, BIO MM 5, BIO MM12, BIO MM 14, CUL MM 2, CUL MM 5 through CUL MM 7, GEO MM 1, HAZ MM 1 through HAZ MM 3, NOI MM 2, TRANS MM 1, TRANS MM 2, and UTL MM 1 in Table ES-2 is hereby amended as follows:

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Biological Resources	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 1 Conservation <u>Mitigation</u> . Monitoring and Reporting Plan: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, <u>coordination with the land management agency(s)</u> , and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, <u>including coordination with the respective land management agency</u>, a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.</p> <p>a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the proposed Project site. Training of additional workers, contractors, and visitors shall be provided, as needed.</p> <p>b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices, that include containment of any spills, disposal of trash, and management of runoff and sediment transport.</p> <p>c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site.</p>	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 5 Hazardous Materials Management:</p> <ul style="list-style-type: none"> a) A toxic substance management and spill response plan shall be prepared by the contractor for review and approval by the Authority. c) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately. d) All construction vehicles are required to carry at least one spill response kit. d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor. 	BJM, BUR, BUR1, BUR2, BUR3, DPK, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, TWR, VPK, WMP, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 12 Coastal California Gnatcatcher Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation. b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection. c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed. d) At proposed Project sites H-17A, PHN, and RIH, a higher level of protection is required to ensure that gnatcatchers are not present when construction activities would occur and adverse effects would be avoided. For proposed Project sites that include known or suspected gnatcatcher nesting or otherwise include suitable nesting habitat where the bird is expected to be present, the following mitigation measure is to ensure the highest level of protection to the bird. All the above measures (BIO MM 1 through BIO MM 3, and BIO MM 8 through BIO MM 12) apply as well as BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions 	H-17A, LEPS, PHN, PWT, RIH, SDW, VPK
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 14 Coastal California Gnatcatcher Protocol Surveys</p> <ul style="list-style-type: none"> a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating 	LEPS, PWT



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).</p> <p>b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the proposed Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.</p> <p>c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the proposed Project site, construction activities may commence beginning July 1 through February 14.</p> <p>d) Survey requirements shall be applied each year that construction activities take place at the Project site.</p>	
Cultural Resources	CUL-1: Significant and Unavoidable	<p>CUL MM 2: Archaeological Monitoring – Historic-Age Resources</p> <p>At proposed Project LMR sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section.</p> <p>The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.</p>	H-69B, LACFCP08, LACFCP09, LPC
Cultural Resources	CUL-1: Significant and Unavoidable	<p>CUL MM 5: Architectural Resources Protection and Camouflage</p> <p>Attachment of Equipment to Historic Buildings and Structures</p>	H-69B, LACFCP08, LACFCP09, LPC



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>Exterior antennas, wiring, towers, and other LMR equipment that are proposed to be attached to buildings, structures, objects, and other features that are listed, eligible, or potentially eligible for inclusion in the NRHP or CRHR, or are locally designated landmarks under CEQA may cause an adverse direct and/or visual effect. Mitigation measures to offset potential effects would include review of the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Guidelines), which can be found on the National Park Service's website at http://www.nps.gov/tps/standards.htm and http://www.nps.gov/tps/standards/four-treatments/standguide/index.htm respectively. The Standards are a series of practices for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines assist in applying the complementary Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historical resource.</p> <p>For historic buildings or structures where communications-related equipment will be attached, the following preservation practices would shall be employed, as applicable, to ensure that impacts are less than ± significant:</p> <ol style="list-style-type: none"> 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an unobtrusive area on the side of the building i.e., an area where it will be hidden by an existing architectural feature. that [insert language characterizing what it means to be "unobtrusive" for purposes of this measure to ensure no impact]. 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, nonpenetrating mounts shall be used. 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment. 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable. 5) Any supports or brackets for new equipment shall be color-matched to the existing materials. 	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.</p> <p>7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.</p> <p>8) Rust-resistant mounts to prevent staining of the building materials shall be used.</p> <p>9) Reversible mounting techniques shall be used to avoid damage to building materials.</p> <p>10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.</p> <p>11) New interior wiring shall utilize space in existing chases, closets, or shafts.</p> <p>12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.</p> <p>13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.</p> <p>Architectural Camouflage</p> <p>All new towers and monopoles or a proposed increase in the height of existing towers and monopoles may that would cause adverse visual impacts on historical resources that are adjacent or within the viewshed shall be camouflaged. All camouflage implemented for the proposed Project designs would shall be sympathetic to the existing landscape and visually compatible with the surrounding architecture, and acceptable to the property owner (http://www.generalcode.com/codification/sample-legislation/cell-towers) and/or host community in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_06-07-11.pdf). Tower disguises may include, but are not limited to, painting and various types of concealments, including (e.g., clock/water towers, flag/light poles, silos, trees, and unique site-specific designs). Such measures must also be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above). As noted within the required mitigation measures for some Project sites, the painting of towers of certain heights is controlled by FAA Advisory Circulars 47 CFR 5-17.21-17.58 to prevent aviation hazards; therefore,</p>	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		painting would not, be a feasible mitigation at those sites.	
Cultural Resources	CUL-3: Less than Significant with Mitigation	<p>CUL MM 6: Potential Paleontological Resources Plan</p> <p>Proposed Project sites with the potential for paleontological resources would require preparation of a paleontological monitoring plan and a qualified paleontological monitor to be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations.</p> <p>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) All ground disturbing work within 165 feet (50 meters) of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area. 4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards. 5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist at project-specific inspections to collect matrix samples for processing. 6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository. 7) All recovered fossils shall be curated at a local accredited and permanent scientific institution 	AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, LACFCP08, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.</p> <p><u>A Paleontological Resources Monitoring Plan shall be developed and approved prior to construction to guide the activities of monitors during ground-disturbing activities. The plan would include, but not be limited to, a description of the project location, the regulatory framework, site-specific impact mitigation requirements designed to reduce impacts to less than significant, specific locations and construction activities requiring monitoring and/or spot checking, procedures to follow for construction monitoring and fossil discovery and recovery, and a repository agreement with the Natural History Museum of Los Angeles County or other accredited repository. Mitigation measures that may be implemented to ensure that impacts to paleontological resources would be reduced to less than significant may include but are not limited to the following:</u></p> <p>a) <u>Worker awareness training on paleontological resources presented to construction personnel prior to the start of construction. The training should include at minimum, the following:</u></p> <ul style="list-style-type: none"> • <u>The types of fossils that could occur at the project site</u> • <u>The procedures that should be taken in the event of a fossil discovery</u> • <u>Laws protecting paleontological resources</u> • <u>Penalties for destroying or removing paleontological resources</u> <p>b) <u>Paleontological monitoring during ground disturbance at all sites with moderate/unknown or high paleontological potential</u></p> <p>c) <u>Salvage of significant fossil resources</u></p> <p>d) <u>Screenwashing of matrix samples for microfossils</u></p> <p>e) <u>Laboratory preparation of recovered fossils to the point of identification and curation</u></p> <p>f) <u>Identification of recovered fossils to the lowest possible taxonomic order</u></p> <p>g) <u>Curation of significant fossils at the Natural History Museum of Los Angeles County or other accredited repository</u></p> <p>h) <u>Preparation of a final monitoring report that includes at a minimum the dates of field work, results of monitoring, fossil analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens</u></p> <p><u>The Plan shall be submitted to the Authority for review and approval and finalized at least 14 days prior to the start of construction.</u></p>	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Cultural Resources	<p><u>CUL-3:Less than Significant with Mitigation</u></p>	<p><u>CUL MM 7: Paleontological Resources Monitoring</u></p> <p><u>Paleontological monitoring shall be conducted by a qualified paleontological monitor who has demonstrated experience in the collection and salvage of fossil materials. An undergraduate degree in geology or paleontology is preferable but is less important than documented experience performing paleontological monitoring and mitigation. The monitor will work under the supervision of a Principal Paleontologist.</u></p> <p><u>The qualified professional paleontological monitor shall be present during ground disturbance at all sites with moderate/unknown or high paleontological potential and as specified in the Paleontological Resources Monitoring Plan prepared in accordance with CUL MM 6. The monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Any sites that require monitoring or mitigation within the Angeles National Forest will require a qualified paleontologist to have a U.S. Department of Agriculture Forest Service-Temporary Special-Use Permit for paleontology. Based on the specific site conditions observed during monitoring (type of sediment impacted, previous disturbances, nature of site conditions), the Principal Paleontologist may reduce or increase monitoring efforts in consultation with the Agency.</u></p> <p><u>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</u></p> <ol style="list-style-type: none"> <u>1) All ground-disturbing work within 50 feet of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. Work shall not resume in the discovery area until authorized by the qualified paleontologist.</u> <u>2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.</u> <u>3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is “unique” under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area.</u> <u>4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of</u> 	<p><u>AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, LACFCP08, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ</u></p>



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p><u>the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards.</u></p> <p>5) <u>Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist to screen matrix test samples on site during monitoring. Additionally, bulk matrix samples may be collected and transported to a laboratory facility for processing.</u></p> <p>6) <u>Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository.</u></p> <p>7) <u>All recovered fossils shall be curated at the Natural History Museum of Los Angeles County or a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.</u></p>	
Geology and Soils	GEO-1: Less than Significant with Mitigation	<p>GEO MM 1 : Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the project sponsor <u>Contractor</u> shall:</p> <p>1) Submit to the appropriate municipality (County of Los Angeles, County of San Bernardino, or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall:</p> <ul style="list-style-type: none"> a. include an analysis of the expected ground motions at the site from known active faults using accepted methodologies b. include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013. c. Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as: <ul style="list-style-type: none"> i. subsurface soil improvement 	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPk, TWR, VPK, WAD, WMP, WTR, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<ul style="list-style-type: none"> ii. deep foundations extending below the liquefiable layers iii. structural slabs designed to span across areas of non-support iv. soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones v. dynamic compaction vi. compaction grouting vii. jet grouting viii. mitigation for liquefaction hazards suggested in the California Geological Survey’s (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicated displacements d. Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults e. Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements <p>2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations.</p> <p>3) The project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements.</p> <p>4) Site construction shall not begin until:</p> <ul style="list-style-type: none"> a. The registered geotechnical engineer representing the applicable permitting municipality for the project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and 	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>b. The applicable permitting municipality for the project site (county or city) has reviewed all project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements</p>	
Hazards and Hazardous Materials	HAZ-4: Less than Significant with Mitigation	<p>HAZ MM 1: Prior to construction activity, the construction contractor must shall prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.</p> <ul style="list-style-type: none"> Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities. If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required. If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety. If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered. The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed. 	PDC
Hazards and Hazardous Materials	HAZ-5: Less than Significant with Mitigation	<p>HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation”</p> <p>The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.</p>	SDW

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460–1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.	
Hazards and Hazardous Materials	HAZ-8: Less than Significant with Mitigation	HAZ MM 3: Fire Management Plan. Prior to construction activity, the Authority must shall work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.	AGH, AJT ,BJM , BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SIM, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
Noise	NOI-3: Less than Significant with Mitigation	<p>NOI MM 2: Prior to commencement of construction at Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers. • Use well-maintained equipment and have equipment inspected regularly. • Operate construction equipment for periods of fewer than 15 consecutive minutes when possible. <p>NOI MM 3: Prior to commencement of construction at any site with an applicable⁺ noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.</p>	WS1
Transportation/Traffic	TRANS-3: Significant Impact Reduced to Less than Significant with Mitigation	HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460–1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.” See above	BJM, DPK, SDW, SGH



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460-1, <u>Notice of Proposed Construction or Alteration</u>. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.</p> <p>Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460-1, <u>Notice of Proposed Construction or Alteration</u>, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.</p>	
Transportation/Traffic	TRANS-4: Less than Significant with Mitigation	<p>TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.</p> <p>TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable</p> <p><u>TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.</u></p>	ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, ZHQ



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Utilities/Service Systems	UTL-1: Significant Impact Reduced to Less than Significant with Mitigation	UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would <u>shall</u> be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
⁺The LA-RICS Authority is not subject to certain local noise ordinances under the doctrine of intergovernmental immunity (Cal. Gov. Code 5-53090(a)).			



Page 1-11; Section 1.6.2

The responsible and trustee local agencies listed in Section 1.6.2 is hereby amended as follows:

Local Agencies

- Los Angeles County
- City of Agoura Hills
- City of Beverly Hills
- City of Calabasas
- City of Cerritos
- City of Chino Hills
- City of Glendale
- [City of Long Beach](#)
- City of Los Angeles
- City of Malibu
- City of Monterey Park
- City of Palmdale
- City of Pasadena
- City of San Dimas
- City of Santa Monica
- City of Signal Hill
- City of West Hollywood
- City of Whittier

Pages 2-16 & 2-18; Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site information for Sites DPK and SGH, listed in Table 2.1-1, is hereby amended as follows:

Table 2.4-1: Potential LMR Sites Analyzed in This EIR

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
DPK	Dakin Peak	Avalon Canyon Rd. Divide Road	Santa Catalina Island	90704	Los Angeles County
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill Long Beach

Page 2-28; Lighting

The text in this section is hereby amended as follows:

The sites would have security lighting. New equipment shelters would generally require exterior security lighting equivalent to a 100-watt light bulb. [Security lighting would be motion-sensing in rural locations and continuous in urban locations.](#) Where required by the FAA, new antenna support structures would be lighted and/or marked consistent with FAA Advisory Circular, AC 70/7460-1L Obstruction Marking and Lighting, for visibility to aircraft, as applicable, based on proposed structure height and location. FAA lighting is not generally required for towers less than 200 feet in height above ground level; however, lighting for air navigation safety may be required at specific locations for shorter structures, depending



on site conditions. If tower obstruction lighting is installed on a tower, it may include red or white light-emitting diode (LED) lamps or strobe lights that are steady and/or flashing.

Page 2-40; Section 2.3

The text in this section is hereby amended as follows:

Sites BUR, BUR1, BUR2, and BUR3, ~~and BUR 4~~

Page 2-42; Section 2.5

The text in this section is hereby amended as follows:

Sites BUR, BUR1, BUR2, and BUR3, ~~and BUR 4~~



Page 2-47; Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Information about projects within 2 miles of Site AJT, listed in Table 2.7-1, is hereby amended as follows:

Table 2.7-2: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
AJT	1.76	9,295	Stonefield Development	1850 Fairway Dr.	Chino Hills	New 28 SFR in gated community in 35 acres	Post Entitlement Review	Tentative subdivision map approved
	1.83	9,660	Hidden Oaks Country Club	1285 Carbon Canyon Rd.	Chino Hills	New 107 residential lots hillside development with open space	Env. Review: EIR	in review
	1.45	7,657	Foremost Communities - Canyon Hills	16432 Carbon Canyon Rd.	Chino Hills	New 76 SFR development with open space	Under Construction	approved tract map

Page 3-10; Table 3.1-1: Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

Information about projects sites located in areas generally containing high or medium viewer sensitivity for Sites BJM, DPK, SGH, and TWR is hereby amended as follows:

Table 2.4-3. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/ SAC ¹	USFS Land Use Zone									
BJM	Blackjack Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X
DPK	Dakin Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X

Table 2.4-3. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/ SAC ¹	USFS Land Use Zone									
SGH	Signal Hill						Skyline Drive	Hilltop and Sunset View parks			Medium	
TWR	Tower Peak				Santa Catalina Island LCP		Trans-Catalina Trail	Catalina Island Conservancy Open Space Easement			High	X

Page 3-16; Section 3.1.1.3

Section 3.1.1.3, addressing scenic corridors, is hereby amended to add the following text after the City of Malibu Scenic Roads text and before the discussion on Santa Monica Mountains North Plan Scenic Routes:

City of Signal Hill Scenic Route

The SGH site is located on a hilltop within a gated residential community, approximately 200 feet north of Skyline Drive. The 2009 City of Signal Hill General Plan Circulation Element identifies Skyline Drive as a scenic route (City of Signal Hill 2009). The plan notes that ‘The entire route provides views of urban Southern California, the ocean, and the downtown Long Beach skyline.’ These views are on the south side of the scenic route. Site SGH is entirely surrounded by residences, as well as a similar site with a large lattice tower immediately adjacent to the south, and an oil drilling rig directly east of and adjacent to the other telecommunication tower.

Page 3-17; Section 3.1.1.3

Section 3.1.1.3, addressing Trans-Catalina Trail is hereby amended to delete the following text:

~~Although it has no official scenic designation,~~ The 37-mile Trans-Catalina trail, completed in 2009, traverses Catalina Island in its entirety and offers “spectacular views across the 43,000-acre Nature Preserve of the Catalina Island Conservancy” (Catalina Island Conservancy 2014). Sites BJM, DPK, and TWR are adjacent to this trail.

Page 3-17; Section 3.1.1.4

Section 3.1.1.4, addressing State and regional parks as well as open space and recreation areas, is hereby amended to add the following text after the subheading and before Topanga State Park:

Catalina Island Conservancy Open Space Easement

A 50-year Open Space Easement Agreement was signed between the County of Los Angeles and the Santa Catalina Island Company in 1974 to preserve the natural character of the island (City of Santa Catalina Island 1983). Land uses defined as Open Space/Directed Recreation and Conservation/Primitive Recreation together comprise 96 percent of Catalina Island. Although no maps were readily available identifying or designating this open space at the time of this analysis, it is assumed that sites BJM, DPK, and TWR are located within this open space.

Page 3-33; Section 3.1.4.1

The project analysis for CEQA Question AES-2 within Section 3.1.4.1 is hereby revised as follows:

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?



No scenic resources were identified within any Project site boundary. The following Project sites are located adjacent to scenic highways as discussed in Section 3.1.1.3:

ENC1	ENT	H-69B	JOP	LACF072
LACFCP08	LEPS	PWT	<u>SGH</u>	TMT
WS1	ZHQ			

Operation Impacts

The SGH site is located approximately 200 feet north of Skyline Drive, designated as scenic by the City of Signal Hill for providing ‘views of Southern California, the ocean, and the downtown Long Beach Skyline.’ However, these views are to the south of the road; the site is on the opposite (north) side of the road. Therefore, the site would not interfere with those views or affect the road’s scenic designation. In addition, views to the south from Skyline Drive adjacent to the site are blocked by existing residential structures. Operational impacts for all other sites would be as described under AES-1 (effects on a scenic vista). Operational impacts on scenic resources would be less than significant.

Page 3-56; Section 3.2.2.3

The local regulatory setting for the Antelope Valley Air Quality Management District (AVAQMD) is hereby revised to add the following:

AVAQMD

AVAQMD Regulation II, Rule 219 (2011) – Federal Operating Permit Requirements

The purpose of this rule is to describe equipment that does not require a permit and which does not need to be listed on an application for a Federal Operating Permit (FOP) or on an issued FOP. Equipment powered by piston type internal combustion engines with a manufacturer’s rating of 50 bhp or less do not require a FOP under this rule.

Page 3-57; Section 3.2.2.3

The local regulatory setting for the South Coast Air Quality Management District (AVAQMD) is hereby revised to add the following:

SCAQMD

SCAQMD Regulation XIV, Rule 1470 (2012) – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines

This rule shall apply to any person who sells, owns, or operates a stationary combustion ignition (CI) engine in the SCAQMD with a rated brake horsepower greater than 50 bhp. Equipment powered by CI engines in excess of 50 bhp, with some exceptions, are required to obtain a permit from the District.



Pages 3-80 to 3-81, Table 3.3-1: Vegetation Communities within the Study Area

Table 3.3-1 is hereby amended to add to the list of Project sites within the study area for selected vegetation communities, as follows:

Table 2.4-4: Vegetation Communities within the Study Areas¹

Vegetation Community	Vegetation Alliance	Study Area(s)
Coastal Sage Scrub	California sagebrush scrub	AGH, BJM, DPK, FTP, GRM, LEPS, MMC, TWR, WTR
Mixed chaparral	Scrub oak chaparral	BJM, CPK, DPK, ENT, TWR, VPK
	Thick-leaved Yerba Santa scrub	JOP
	Toyon chaparral	GRM, TWR
Non-native grassland	Annual brome grass Semi-natural herbaceous stands	BJM, DPK, TPK, TWR

Page 3-83, Section 3.3.1.2

The text revising special status species designations is hereby amended as follows:

[Santa Catalina Island](#)

[Species identified from the Santa Catalina Island Local Coastal Plan \(Appendix G\)](#)

[Species information received in public comments from the Catalina Conservancy](#)

Page 3-85, Table 3.3-3

The study area description for sites BJM, DPK, and TWR, as listed in Table 3.3-3, are hereby amended as follows:

Table 2.4-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
BJM	<p>Site BJM is located on Black Jack Peak on Santa Catalina Island on a hilltop that has been leveled and mostly paved to support the existing facilities. The vegetation in the area has been heavily impacted by overgrazing and long term drought, resulting in bare soil and an increase in non-palatable plant species. Adjacent to the site is coastal sage scrub bisected by hiking trails and bike paths. The site contains many native and nonnative mature trees. Diagnostic woody shrubs include coast prickly pear (<i>Opuntia littoralis</i>), laurel sumac (<i>Malosma laurina</i>), toyon (<i>Heteromeles arbutifolia</i>), coyote bush (<i>Baccharis pilularis</i>), bush monkeyflower (<i>Diplacus aurantiacus</i>), lemonadeberry (<i>Rhus integrifolia</i>), and island oak (<i>Quercus pacifica</i>).</p> <p>Site BJM is located on the top of Blackjack Peak, the third highest mountain on Catalina Island. North-facing slopes of Blackjack are dominated by intact Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral; south-facing slopes are dominated by intact Coastal Sage Scrub (note: areas mapped as Bare Ground in 2003 are largely recovering into Coastal Sage Scrub). Outside the study area, a former silver mine pit is located above the Blackjack Campground access road on the north side of the peak. Blackjack Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail passes just southwest of the peak; and the Airport Road, very popular for motor tours, is just to the east.</p>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissantheium (<i>Dissantheium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		island rush-rose (<i>Crocanthemum greenii</i>)	ESA-T CRPR-1B.2
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus ssp. floribundus</i>)	CRPR-1B.2
		Santa Catalina Island manzanita (<i>Arctostaphylos catalinae</i>)	CRPR-1B.2
		Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1

Table 2.4-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1
DPK	<p>Site DPK is located on Santa Catalina Island on a ridgeline within a transition of coastal sage scrub and chaparral vegetation communities. The area has been overgrazed, resulting in areas of bare soil. Common shrubs include coast prickly pear, white sage (<i>Salvia apiana</i>), laurel sumac, island buckwheat (<i>Eriogonum crocatum</i>), sagebrush, toyon (<i>Heteromeles arbutifolia</i>), black sage, and lemonadeberry.</p> <p>Site DPK is located on the top of Dakin Peak, a prominent high point above Avalon and Silver/Grand canyons. The peak is dominated by Coastal Sage Scrub with areas of Grassland (<i>Bromus-Avena-Nasella</i>) and Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral. Outside the study area, Dakin Peak is visible from many locations on and around Catalina Island. The Trans-Catalina Trail follows the Divide Road immediately east and northwest of the existing tower. The Divide Road is also a very popular road for interior jeep tours.</p>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Santa Catalina shrew (<i>Sorex ornatus willetti</i>)	CDFW-SSC
		aphanisma (<i>Aphanisma blitoides</i>)	CRPR-1B.2
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		chaparral ragwort (<i>Senecio aphanactis</i>)	CRPR-2B.2
		coast woolly-heads (<i>Nemacaulis denudata</i> var. <i>denudata</i>)	CRPR-1B.2
		Coulter's saltbush (<i>Atriplex coulteri</i>)	CRPR-1B.2
		Davidson's saltscale (<i>Atriplex serenana</i> var. <i>davidsonii</i>)	CRPR-1B.2
		island green dudleya (<i>Dudleya virens</i> ssp. <i>insularis</i>)	CRPR-1B.2
		island rush-rose (<i>Crocانthemum greenei</i>)	ESA-T CRPR-1B.2
		Nevin's woolly sunflower (<i>Constancea nevinii</i>)	CRPR-1B.3
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1



Table 2.4-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island desert-thorn (<i>Lycium brevipes</i> var. <i>hasse</i>)	CRPR-1B.1
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>)	CRPR-1B.2
		Santa Catalina Island manzanita (<i>Arctostaphylos catalinae</i>)	CRPR-1B.2
		Santa Catalina Island monkeyflower (<i>Mimulus traskiae</i>)	CRPR-1A
		Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1
		showy island snapdragon (<i>Gambelia speciosa</i>)	CRPR-1B.2
		south coast saltscale (<i>Atriplex pacifica</i>)	CRPR-1B.2
		Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1
TWR	Site TWR is located on a hilltop of Tower Peak along a steep ridge in highly disturbed coastal sage scrub vegetation. Island oak trees are on north-facing slopes and into broad canyons below the Project site. Coastal sage scrub on the dryer habitats is dominated by coast prickly pear, coastal sagebrush, and toyon. <u>Site TWR is located on the top of Tower Peak, a prominent high point above the Isthmus/Two Harbors area. The peak is dominated by Coastal Sage Scrub with areas of Grassland (Bromus-Avena-Nasella) and Island Scrub Oak (<i>Quercus pacifica</i>) Chaparral. The Trans-Catalina Trail follows the Banning Road</u>	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		essential fish habitat	MSA
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2



Table 2.4-5: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	<p>immediately west of the existing tower. Outside the study area, Tower Peak is visible from many locations on and around Catalina Island.</p>	Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
Catalina Island dudleya (<i>Dudleya virens</i> ssp. <i>hassei</i>)		CRPR-1B.2	
Coulter's saltbush (<i>Atriplex coulteri</i>)		CRPR-1B.2	
decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)		CRPR-1B.2	
Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)		ESA-E ESA-CH CA-E CRPR-1B.1	
Nevin's woolly sunflower (<i>Constancea nevinii</i>)		CRPR-1B.3	
round-leaved filaree (<i>California macrophylla</i>)		CRPR-1B.1	
Santa Catalina figwort (<i>Scrophularia villosa</i>)		CRPR-1B.2	
Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)		CRPR-1B.2	
Santa Catalina Island currant (<i>Ribes viburnifolium</i>)		CRPR-1B.2	
Santa Catalina Island ironwood (<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>)		CRPR-1B.2	
showy island snapdragon (<i>Gambelia speciosa</i>)		CRPR-1B.2	
			Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)

Page 3-102, Section 3.3.1.2

The text is hereby amended by including the following information:

In addition to the sensitive species identified in Table 3.3-3, the following species have been identified as locally important from the Catalina Conservancy and Appendix G of the Santa Catalina Island Local Coastal Plan. Where appropriate, species names shown from Appendix G of the Local Coastal Plan have been updated (with the former names shown in parentheses).

<u><i>Abronia umbellata</i></u>	<u><i>Acmispon (Lotus) argophyllus</i> var <i>ornithopus</i></u>	<u><i>Acmispon (Lotus) grandiflora</i></u>	<u><i>Acmispon glaber (Lotus scoparius)</i></u>
<u><i>Acmispon subpinnatus</i></u>	<u><i>Ammannia coccinea</i></u>	<u><i>Andropogon barbinodis</i></u>	<u><i>Arthrocnemum (Salicornia) subterminale</i></u>
<u><i>Antirrhinum kelloggii</i></u>	<u><i>Aphanisma blitoides</i></u>	<u><i>Arctostaphylos catalinae</i></u>	<u><i>Arenaria douglasii</i></u>
<u><i>Aristida adscensionis</i></u>	<u><i>Asclepias fascicularis</i></u>	<u><i>Aspidotis californica</i></u>	<u><i>Astragalus didymocarpus</i> var <i>didymocarpus</i></u>
<u><i>Astragalus trichopodus</i> var <i>trichopodus</i></u>	<u><i>Athysanus pusillus</i></u>	<u><i>Atriplex coulteri</i></u>	<u><i>Atriplex watsonii</i></u>
<u><i>Bergerocactus emoryi</i></u>	<u><i>Brodiaea jolonensis</i></u>	<u><i>Bromus arizonicus</i></u>	<u><i>Calandrinia maritima</i></u>
<u><i>Callitriche marginata</i></u>	<u><i>Cardamine californica</i></u>	<u><i>Carex praeagrailis</i></u>	<u><i>Carex triquetra</i></u>
<u><i>Carpobrotus aequilaterus</i></u>	<u><i>Ceanothus arboreus</i></u>	<u><i>Ceanothus megaracarpus</i> var <i>insularis</i></u>	<u><i>Cercocarpus traskiae</i></u>
<u><i>Chenopodium macrospermum</i> var <i>farinosum</i></u>	<u><i>Chorizanthe staticoides</i></u>	<u><i>Clinopodium (Satureja) douglasii</i></u>	<u><i>Constancea (Eriophyllum) nevinii</i></u>
<u><i>Crassula aquatica</i></u>	<u><i>Cressa truxillensis</i> var <i>vallicola</i></u>	<u><i>Crocyanthemum (Helianthemum) greenei</i></u>	<u><i>Crossosoma californicum (californica)</i></u>
<u><i>Cryptantha micromeres</i></u>	<u><i>Cryptantha wigginsii</i></u>	<u><i>Deinandra (Hemizonia) clementina</i></u>	<u><i>Dendromecon harfordii</i></u>
<u><i>Dendromecon rigida</i> ssp <i>rhamnoides</i></u>	<u><i>Dichondra occidentalis</i></u>	<u><i>Dissanthelium californicum</i></u>	<u><i>Dudleya greenei</i></u>
<u><i>Dudleya virens</i> ssp <i>hassei</i></u>	<u><i>Dudleya virens</i> ssp <i>insularis</i></u>	<u><i>Elatine californica</i></u>	<u><i>Eriastrum filifolium</i></u>
<u><i>Eriqeron foliosus</i></u>	<u><i>Eriqeron grande</i> var <i>grande</i></u>	<u><i>Eriodictyon traskiae</i> ssp <i>traskiae</i></u>	<u><i>Eriogonum giganteum</i> var <i>giganteum</i></u>
<u><i>Eschscholtzia ramosa</i></u>	<u><i>Euphorbia misera</i></u>	<u><i>Euphorbia spatulata</i></u>	<u><i>Galium catalinense</i> ssp <i>catalinense</i></u>
<u><i>Galium nuttallii</i> ssp <i>insulare</i></u>	<u><i>Gambelia (Galvesia) speciosa</i></u>	<u><i>Gilia capitata</i> ssp <i>abrotanifolia</i></u>	<u><i>Gilia nevinii</i></u>



<u>Gnaphalium palustre</u>	<u>Helenium puberulum</u>	<u>Hesperolinon micranthum</u>	<u>Heteromeles arbutifolia var macrocarpa</u>
<u>Holodiscus discolor</u>	<u>Hordeum intercedens</u>	<u>Hordeum californicum</u>	<u>Jaumea carnosa</u>
<u>Jepsonia malvifolia</u>	<u>Lavatera assurgentiflora</u>	<u>Laennecia (Conyza) coulteri</u>	<u>Lastarriaea (Chorizanthe) coriacea</u>
<u>Lepechinia fragrans</u>	<u>Leptosyne (Coreopsis) gigantea</u>	<u>Linanthus bicolor</u>	<u>Lithophragma affine ssp mixtum</u>
<u>Lycium brevipes var hassei</u>	<u>Lyonothamnus floribundus ssp floribundus</u>	<u>Malvella (Sida) leprosa</u>	<u>Mentzelia micrantha</u>
<u>Microseris douglasii ssp platycarpha</u>	<u>Mimulus guttatus</u>	<u>Mimulus traskiae</u>	<u>Monanthochloe littoralis</u>
<u>Nemophila menziesii</u>	<u>Notholaena californica</u>	<u>Ophioglossum californicum</u>	<u>Orobanche bulbosa</u>
<u>Orobanche fasciculata franciscana</u>	<u>Papaver californicum</u>	<u>Paspalum distichum</u>	<u>Pentachaeta (Chaetopappa) lyonii</u>
<u>Phacelia distans</u>	<u>Phacelia grandiflora</u>	<u>Phacelia lyonii</u>	<u>Piperia unalascensis</u>
<u>Plagiobothrys nothofulvus</u>	<u>Platystemon californicus</u>	<u>Pluchea odorata (purpurascens)</u>	<u>Potamogeton foliosus</u>
<u>Potentilla glandulosa</u>	<u>Pseudognaphalium (Gnaphalium) microcephalum</u>	<u>Psilocarphus tenellus</u>	<u>Quercus engelmannii</u>
<u>Quercus lobata</u>	<u>Quercus tomentella</u>	<u>Rhamnus pirifolia</u>	<u>Ribes viburnifolium</u>
<u>Salicornia pacifica</u>	<u>Shoenoplectus americanus (Scirpus olneyi)</u>	<u>Scirpus robustus</u>	<u>Scrophularia villosa</u>
<u>Sibara filifolia</u>	<u>Sisyrinchium bellum</u>	<u>Solanum wallacei</u>	<u>Solidago velutina ssp californica</u>
<u>Senecio lyonii</u>	<u>Spergularia marina</u>	<u>Stebbinoseris (Microseris) heterocarpa</u>	<u>Stipa cernua</u>
<u>Stylomecon heterophylla</u>	<u>Suaeda californica</u>	<u>Thysanocarpus curvipes ssp elegans</u>	<u>Trichostema lanceolatum</u>
<u>Trifolium albopurpureum</u>	<u>Trifolium gracilentum</u>	<u>Trifolium macraei</u>	<u>Trifolium microdon var pilosum</u>
<u>Trifolium palmeri</u>	<u>Tropidocarpum gracile</u>	<u>Vitis girdiana</u>	<u>Xylococcus bicolor</u>



Page 3-103, Table 3.3-4: Sensitive Plant Communities Located within One Mile of Proposed Project Sites

The list of Project sites located within one mile of the California Walnut Woodland vegetative community is hereby amended as follows:

Table 2.4-6: Sensitive Plant Communities Located within One Mile of Proposed Project Sites

Sensitive Community	Project Sites
California Walnut Woodland	AGH , AJT, ENT, OAT, PHN, SIM

Pages 3-126 and 3-128; Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

The list of Project sites with a study area generally within suitable habitat for certain protected species is hereby amended as follows:

Table 2.4-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC	BJM , DPK , H-17A, TWR
California mountain kingsnake (<i>Lampropeltis zonata</i>)	CDFW-SSC USFS-Sens	BJM , H-69B, SPN, TOP
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC USFS-Sens	BJM, DPK , TWR

Pages 3-131 and 3-132; Section 3.3.4.1

Three biological resource mitigation measures are hereby amended as follows:

BIO MM 1 **Conservation** [Mitigation](#) Monitoring and Reporting Plan

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, [coordination with the land management agency\(s\)](#), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.



BIO MM 2 Worker Environmental Awareness Program

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, [including coordination with the respective land management agency](#), a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

BIO MM 5 Hazardous Materials Management:

- a) A toxic substance management and spill response plan shall be prepared by the contractor [for review and approval by the Authority](#).
- b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately.
- c) All construction vehicles are required to carry at least one spill response kit.
- d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.

Page 3-147; Section 3.3.4.1

The last paragraph of the impact analysis for raptors is hereby amended as follows:

The burrowing owl was recorded about 0.2 mile west of the proposed Project Site H-17A along Skyline/Fire Ridge Road. The bird was using the cleared firebreak along the road following the ridge. Similar and contiguous habitat is found within Site H-17A and its study area. [Burrowing owls are also known to be present throughout Santa Catalina Island, which includes the vicinity of sites BJM, DPK, and TWR. Site DPK is located in rolling grassland, while sites BJM and TWR are in mountainous terrain, less conducive to burrowing owls.](#)

Page 3-148; Section 3.3.4.1

In the discussion of construction impacts to raptors, the first paragraph on Page 3-148 is hereby amended to the following:

Burrowing owls typically remain in the vicinity of their burrows and would be more susceptible to disturbance or destruction; impacts to burrowing owl from construction at proposed Project [Site sites BJM, DPK, H-17A, or TWR](#) would be significant.

Page 3-154; Section 3.3.4.1

The introductory impact analysis for the Santa Catalina Island Fox is hereby amended as follows:



The Santa Catalina Island fox ~~typically is found in dense shrubby vegetation; however, it has been observed using all habitat types present on Santa Catalina Island and could be found anywhere on the island—grasslands, shrublands, coastal marshes, and forests.~~ is a habitat generalist and is found throughout Catalina Island in all natural habitats and areas of human habitation and development. The fox is omnivorous, eating fruits, insects, birds, eggs, crabs, lizards, and small mammals. Individual foxes tend to move about rather than travel in packs. The fox is generally nocturnal, with peaks of activity at dawn and dusk; it is not intimidated by humans. Santa Catalina Island foxes give birth to young in simple dens, under shrubs, or in the sides of ravines (Laughrin 1973). Young ~~are born from early to~~ can be born any time from late February through late April after a gestation period of approximately 50 to 53 days. Litter size ranges from one to five kits (Moore and Collins 1995).

Major threats to the fox ~~have been canine distemper~~ have been disease outbreaks (e.g., the canine distemper outbreak in the late 1990s that almost wiped out the population), mortality from vehicle collisions or other dangers associated with human development (e.g., drowning in open containers of liquids, poisoning, becoming trapped in open excavations), and predation by golden eagles; however, no golden eagles have been seen on the island since the mid-1980s (Catalina Island Conservancy 2015). Though none of the three proposed Project sites on Santa Catalina Island (BJM, DKP, and TWR) are within what may be considered preferred fox habitat, the area surrounding each of these three sites could be occupied by foxes. Catalina Island foxes could be expected at all three sites and would be expected to investigate any changes to the sites during active construction, including open holes and trenches, open containers of liquids, and food wastes.

Page 3-157; Section 3.3.4.1

The impact analysis for small animals is hereby amended as shown in the following sentence:

...Potentially suitable habitat for one or more of these species is assumed to be found within 14 study areas (see **Table 2.4-7**), with the coast horned lizard and California mountain kingsnake potentially occurring within multiple locations (12 study areas and ~~3~~ 4 study areas, respectively)...

Page 3-157 and 3-158; Section 3.3.4.1

In the discussion of construction impacts to small animals, the second and third paragraphs are hereby amended to the following:

There would be no impact to Townsend's big-eared bat or western mastiff bat due to construction-related impacts at sites BJM, DPK, and OAT, and TWR.

Construction-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.



Page 3-158; Section 3.3.4.1

In the discussion of operational impacts to small animals, the second and third paragraphs are hereby amended to the following and the introduction to the mitigation measures is also amended:

Bat mortality is not a concern due to new towers being added to any site or addition of lighting. Bats may be attracted to the lights for insect foraging; but strikes are not anticipated as all parts of the towers will be stationary and not mobile, thus allowing the bats to navigate safely around the structures. There would be no impact to Townsend’s big-eared bat or western mastiff bat due to operational activities at sites BJM, ~~DPK, and OAT, and TWR.~~

Operations-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.

Mitigation Measures

The following mitigation measures would be implemented for California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK (see Table 2.4-7) (mitigation measures previously described are listed by name only):

Page 3-159; Section 3.3.4.1

The first paragraph of post-mitigation impact analysis for small animals is hereby amended as follows:

Though impacts to California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites would be less than significant without application of mitigation measures, these measures would still apply at these sites regardless of the level of significance and would further reduce the already less than significant impacts at sites BJM, CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK. Since there would be no impact to Townsend’s big-eared bat or western mastiff bat, no mitigation measures for these species apply to Project sites BJM, ~~DPK, and OAT, and TWR.~~

Page 3-192; Table 3.3-10

Table 3.3-10 is hereby amended as follows:

Table 2.4-8: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
BJM	Santa Catalina Island Local Coastal Program (CRA)	N/A
DPK	Santa Catalina Island Local Coastal Program (CRA)	N/A
TWR	Santa Catalina Island Local Coastal Program (CRA)	N/A



Pages 3-218 to 3-221 and Page 3-235, Table 3.3-12

The special status species associated with Sites BJM, DPK, and TWR, as listed in Table 3.3-12, are hereby amended as follows

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
BJM	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	California dissantheium (<i>Dissantheium californicum</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcross (<i>Sibara filifolia</i>)	LM	
	Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	NI	
	Wallace's nightshade (<i>Solanum wallacei</i>)	LM	
	migratory birds (including Island loggerhead shrike, San Clemente spotted towhee, and Hutton's vireo)	LM	
Local Policies - Santa Catalina Island Local Coastal Plan	LM		
DPK	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcross (<i>Sibara filifolia</i>)	LM	
	migratory birds (including Island loggerhead shrike, San Clemente spotted towhee, and Hutton's vireo)	LM	

	Local Policies - Santa Catalina Island Local Coastal Plan	LM	<ul style="list-style-type: none"> BIO MM 24 Special Status Plants Surveys and Protection
TWR	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	burrowing owl (<i>Athene cunicularia</i>)	LM	
	decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	
	Lyon’s pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Wiggins’ cryptantha (<i>Cryptantha wigginsii</i>)	LM	
	migratory birds (including Island loggerhead shrike, San Clemente spotted towhee, and Hutton’s vireo)	LM	
Local Policies - Santa Catalina Island Local Coastal Plan	LM		

Page 3-327; following Section 3.3.4.1

A new Section 3.3.4.2 is hereby added to state the following:

3.3.4.2 No Project Alternative

Under the No Project Alternative, the proposed Project sites would not be developed as communications sites. As a result, no biological resources would be affected by implementation of this alternative

Page 3-319, Table 3.4-3

Table 3.4-3 is hereby amended to add a footnote for Sites BJM, DPK, and TWR, as follows:



Table 2.4-9. Proposed Project Sites by Impact Level – Archaeological and Architectural Resources

Impact Level	No Historical Resources impacted	Less Than Significant Impacts	Adverse Impacts Mitigated to Less than Significant Levels	Significant and Unavoidable Impacts
Sites	AGH**, AJT, ASD, BJM***, CPK, DPK***, ENT**, FTP, GRM, H-17A, LACF072, LARICSHQ, LEPS**, MMC, OAT, PDC, PHN, RIH, SDW, SGH, SIM, SPN, TPK, TWR***, VPK, WS1	BUR*, BUR1*, BUR2*, BUR3*, FRP*, GMT*, JOP*, JPK*, JPK2*, LACFCP11*, MML*, MTL2*, PMT*, SUN*, SUN2*, TMT*, WMP*, WTR*	PASPD01, PWT*, WAD, ENC1, TOP, ZHQ	H-69B, LACFCP08*, LACFCP09*, LPC*
<p>* Proposed Project sites on federal lands require consultation and coordination with the appropriate federal agency.</p> <p>** Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.</p> <p>*** Based on records searches and field surveys, no archaeological sites are within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground-disturbing activities at the request of the Catalina Island Conservancy.</p>				

Page 3-350; Section 3.5.4.1

Mitigation measures GEO MM 1 is hereby amended as follows:

GEO MM 1 Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the ~~project sponsor~~ Contractor shall:

Page 3-372; Table 3.7-4: Proposed Project Sites with Low Potential to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

A typographical error in the address for Site SGH is hereby corrected as follows:

Table 2.4-10: Proposed Project Sites with Low Potential to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

Site ID	Site Name	Address
SGH	Signal Hill	2321 Stanley Ave, Signal Hills CA 90755



Pages 3-385 and 3-389; Section 3.7.4.1

Mitigations measures HAZ MM 1 and HAZ MM 3 are hereby amended as follows:

HAZ MM 1 Prior to construction activity, the construction contractor ~~must~~shall prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.

HAZ MM 3 Fire Management Plan. Prior to construction activity, the Authority ~~must~~shall work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.

Page 3-427, Section 3.9.4.1

Text describing the Santa Catalina Island Local Coastal Plan is hereby amended as follows:

The *Santa Catalina Island Local Coastal Plan* was approved by the Los Angeles County Board of Supervisors on March 15, 1983, and was certified by the CCC on November 17, 1983. [The plan is codified in the Los Angeles County Code at Sections 22.46.050 through 22.46.750.](#)

Page 3-434 – 3-442, Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Table 3.9-4 is hereby amended as follows:

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
AGH	Agoura Hills	City of Agoura Hills General Plan Update Los Angeles County General Plan 2035	Open Space Deed Restricted	Open Space Deed Restricted	60 feet <u>Not allowed in Open Space Deed Restricted zone</u>	Yes, exceeds height restriction by up to 10 feet² <u>prohibited use in Open Space Deed Restricted zone¹</u>
AJT	AeroJet	City of Chino Hills Draft 2014 General Plan Update Los Angeles County General Plan 2035	Undesignated	Rural Residential	70 <u>35 feet</u>	No



Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
WAD	Walker Drive	City of Beverly Hills General Plan Los Angeles County General Plan 2035	Single Family Residential – Low Density	One-Family Residential Zone Parks, Reservoirs, Government (Unzoned)	N/A	Inconsistent with County plan

Page 3-444; Section 3.9.4.1

The discussion of construction impact for question LU-1 is hereby amended as follows:

As indicated in Table 3.9-4, a review of city and county general plans and zoning ordinances indicate that Sites ~~AGH~~, FTP, H-17A, JPK, JPK2, LEPS, MMC, PASPD01, and SDW are inconsistent with local zoning ordinances regarding height restrictions. [Site AGH is inconsistent with the Open Space Deed Restricted zoning, which is designated to set aside natural open space by restricting development.](#) Additionally, Sites JPK and JPK2...



Pages 3-460 and Page 3-470, Table 3.10-2; Summary of Local Regulations

Table 3.10-2 is hereby amended for selected sites, as follows

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
AGH(Agoura Hills)	Agoura Hills	Los Angeles	<p>City of Agoura Hills; Article IX - Zoning; Chapter 6 - Regulatory Provisions, Part 2 - Special Regulations; Division 6 - Noise Regulations.</p> <p>City of Agoura Hills 2035 General Plan Update.</p>	<p>None specified General Plan Community Noise Equivalent Levels: Table N-1 Land Use Compatibility (Residential)</p> <p>Zone A (clearly compatible) < 60 Dba CNEL</p> <p>Zone B (normally compatible) 60 – 70 dBA CNEL</p> <p>Zone C (normally incompatible) 70 – 75 dBA CNEL</p> <p>Zone D (clearly incompatible) > 75 dBA CNEL</p> <p>Table N-2 Interior/Exterior Standards(Residential)</p> <p>Interior 45 dBA CNEL</p> <p>Exterior 55 dBA CNEL</p>	<p>Work must not occur between 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a legal holiday.</p>	<p>See noise restrictions</p>
SGH (Signal Hill)	Signal Hill	Los Angeles	<p>City of Signal Hill, California, Municipal Code, Title 9 Public, Peace, Morals and Welfare, Chapter 9.16</p>	<p>none specified</p>	<p>No person shall carry on any construction activities, including the erection, demolition, excavation, modification, alteration or repair of any building or structures, or any other activities creating construction noise as defined in this section other than between the hours of seven a.m. and six</p>	<p>See noise restrictions</p>



Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
			Noise		<p>p.m. on weekdays, except as otherwise permitted in this section. It is the purpose of this section to promote quiet and peaceful residential areas by limiting construction activities which create disturbing noise to reasonable times and circumstances, but such limitations shall not apply where residences will not be affected, where individual homeowners are performing maintenance work, or to emergency circumstances.</p> <p><u>Per Chapter 9.16.060 of the Municipal Code, machinery and other equipment, including air conditioning units, generators, etc. operating for more than 5 minutes cannot exceed the ambient noise level at the property line. The daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) ambient noise level for residential areas prescribed in Chapter 9.16.020 of the Signal Hill Municipal Code are 60 dbA and 50 dbA, respectively.</u></p>	



Page 3-516; Section 3.12.2.3

The discussion of Signal Hill Circulation Element, Scenic Routes is hereby amended as follows:

City of Signal Hill General Plan (2009)

Circulation Element, Scenic Routes – designates a series of roadways at higher elevations as scenic routes. [Skyline Drive, located immediately south of the project site, is a designated scenic route.](#)

Page 4-12, Site AGH

Site AGH, Question BIO-2, Mitigation Measure(s) is hereby amended as follows:

Mitigation Measure(s):

~~Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut trees to protect the plant's root system.~~ Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23

Page 4-28, Site AGH

Site AGH, Land Use Planning Setting, zoning height restriction question and the second paragraph in the discussion for Question LU-1 are hereby amended as follows:

What is the zoning height restriction, if any?: ~~60-feet~~ [Development is limited to passive recreational facilities; height restriction for this zone is not identified.](#)

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Discussion:

Based on the zoning ordinances for this site, ~~the maximum allowable height of structures in this area is 60-feet~~ [development is limited to passive recreational facilities \(such as parks and trails\) with a conditional use permit.](#)

Page 4-64, Site AJT

Site AJT, Land Use Planning Setting, zoning height restriction question is hereby amended as follows:

What is the zoning height restriction, if any?: ~~70~~ [35](#) feet

Page 4-113, Site BJM

The Site BJM Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~-Yes

If yes, enter recreation area name: ~~N/A~~ [Catalina Island Conservancy Open Space Easement](#)

Page 4-121, Site BJM

For Site BJM, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

[California mountain kingsnake \(*Lampropeltis zonata*; CDFW-SSC, USFS-Sens\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat (*Corynorhinus townsendii*; CA-PT; CDFW-SSC); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); groundfish (M&FEFH).

Special Status Plants Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); [bobtail barley \(*Hordeum intercedens*, 3.2, SCI\)](#); [California adderstongue \(*Ophioglossum californicum*; 4.2, SCI\)](#); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); [climbing bedstraw \(*Galium nuttallii* ssp. *insulare*; 4.3, SCI\)](#); [Coulter's saltbush \(*Atriplex coulteri*; 1B.2\)](#); [island ceanothus \(*Ceanothus megacarpus* var. *insularis*; 4.3, SCI\)](#); [island Jepsonia \(*Jepsonia malvifolia*; 4.2, SCI\)](#); [island live oak \(*Quercus tomentella*; 4.2, SCI\)](#); [island pitchersage \(*Lepechinia fragrans*; 4.2, SCI\)](#); [island poppy \(*Eschscholzia ramosa*; 4.3, SCI\)](#); island rush-rose (*Crocanthemum greeni*; ESA-T, 1B.2); [Nevin's gilia \(*Gilia nevinii*; 4.3, SCI\)](#); roundleaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); [Santa Catalina Island bedstraw \(*Galium catalinense* ssp. *catalinense*; 1B.3\)](#); [Santa Catalina Island buckwheat \(*Eriogonum giganteum* var. *giganteum*; 4.3, SCI\)](#); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Cruz Island wingedrock cress (*Sibara filifolia*; ESA-E, 1B.1); south island bush-poppy (*Dendromecon harfordii* var. *ramnoides*; 3.1); Wallace's nightshade (*Solanum wallacei*; 1B.1); [western dichondra \(*Dichondra occidentalis*; 4.2, SCI\)](#).

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

[burrowing owl \(*Athene cunicularia*; CDFW-SSC\)](#); [California mountain kingsnake \(*Lampropeltis zonata*; CDFW-SSC, USFS-Sens\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-PT); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&FEFH); [Coulter's saltbush \(*Atriplex coulteri*; 1B.2\)](#); dissanthelium (*Dissanthelium californicum*; 1B.2); round-leaved filaree (*California macrophylla*; 1B.1); [Santa Catalina Island bedstraw \(*Galium catalinense* ssp. *catalinense*; 1B.3\)](#); Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1); round-leaved filaree (*California macrophylla*; 1B.1); island rush-rose (*Crocanthemum greeni*; ESA-T, 1B.2); Wallace's nightshade (*Solanum wallacei*; CNPS-1B.1)

Page 4-125, Site BJM

Impact analysis for Impact CUL-1 is hereby modified as follows:

Mitigation Measure(s):

~~None required~~ [CUL MM 1](#)

Page 4-335, Site DPK

Site DPK, Project Description, address is hereby amended as follows:

Address: ~~Avalon Canyon Rd.~~ [Divide Road](#)

Page 4-338, Site DPK

The Site DPK Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~ [Yes](#)

If yes, enter recreation area name: ~~N/A~~ [Catalina Island Conservancy Open Space Easement](#)

Page 4-345, Site DPK

For Site DPK, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

aphanisma (*Aphanisma blitoides*; 1B.2); beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); [bright green dudleya \(*Dudleya virens* ssp. *insularis*; 1B.2, SCI\)](#); [bobtail barley \(*Hordeum intercedens*, 3.2, SCI\)](#); [California adderstongue \(*Ophioglossum californicum*; 4.2, SCI\)](#); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); chaparral ragwort (*Senecio aphanactis*; 2B.2); coast woolly-heads (*Nemacaulis denudata* var. *denudata*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); Davidson's saltscale (*Atriplex serenana* var. *davidsonii*; 1B.2); [island ceanothus \(*Ceanothus megacarpus* var. *insularis*; 4.3, SCI\)](#); island green dudleya (*Dudleya virens* ssp. *insularis*; 1B.2); [island Jepsonia \(*Jepsonia malvifolia*; 4.2, SCI\)](#); [island live oak \(*Quercus tomentella*; 4.2, SCI\)](#); [island poppy \(*Eschscholzia ramosa*; 4.3, SCI\)](#); island rush-rose (*Crocyanthemum greenei*; ESA-T, 1B.2); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *catalinense*; 1B.2); [Santa Catalina Island buckwheat \(*Eriogonum giganteum* var. *giganteum*; 4.3, SCI\)](#); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hasse*; 1B.1) ; Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *Floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Catalina Island monkeyflower (*Mimulus traskiae*; 1A); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1);



showy island snapdragon (*Gambelia speciosa*; 1B.2); south coast saltscale (*Atriplex pacifica*; 1B.2); [south island bush-poppy \(*Dendromecon harfordii* var. *rhamnoides*; 3.1\)](#); Wallace's nightshade (*Solanum wallacei*; 1B.1); [western dichondra \(*Dichondra occidentalis*; 4.2, SCI\)](#).

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

[burrowing owl \(*Athene cunicularia*; CDFW-SSC\)](#); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-CT; CDFW-SSC); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) island rush-rose (*Crocathemum greenei*; ESA-T, CNPS-1B.2); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1)

Page 4-349, Site DPK

Impact analysis for Impact CUL-1 is hereby modified as follows:

Mitigation Measure(s):

~~None required~~ [CUL MM 1](#)

Page 4-1487, Site SGH

Site SGH, Project Description, the city and land owner are hereby amended as follows:

City: ~~Signal Hill~~ [Long Beach](#)

Landowner: GTE California Inc. [and Long Beach City](#)

Page 4-1490, Site SGH

For Site SGH, Aesthetics Setting, the visual description is hereby amended as follows:

Visual Description: The site is located on a hilltop within a gated residential community, [approximately 200 feet north of Skyline Drive. The 2009 City of Signal Hill General Plan Circulation Element identifies Skyline Drive as a scenic route \(City of Signal Hill 2009\). The plan notes that ‘The entire route provides views of urban Southern California, the ocean, and the downtown Long Beach skyline. The site consists of an elongated concrete surface ...](#) A small park (Sunset View Park) is south of the site and provides views of the distant horizon to the south. This elongated park parallels ~~a road~~ [Skyline Drive](#) and consists of low grasses and shrubs, concrete benches, and a concrete path.

Page 4-1505, Site SGH

For Site SGH, Question GEO-2, Discussion is hereby amended as follows:

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Discussion:



The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of ~~Signal Hill~~ [Long Beach](#) planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Page 4-1514, Site SGH

Site SGH, Land Use Planning Setting, local agency jurisdiction and zoning are hereby amended as follows:

Local Agency Jurisdiction: ~~Signal Hill~~ [City of Long Beach](#)

Zoning: Hilltop Specific Plan District, [Antenna and Microwave Consolidation/Park Site](#). Note: The Hilltop Area Specific Plan includes view protection provisions, but the City of Signal Hill is not administering permits for the project.

Pages 4-1516 and 4-1517, Site SGH

For Site SGH, Question NOI-1, the fifth paragraph of the discussion is hereby amended as follows:

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable" community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. In addition, the closest adjacent receiver to the site property line is separated by a 5-foot privacy wall that would provide an additional 5 dBA of noise mitigation and a net 51 dBA at the property line. Noise levels from both sources would be below the 60 dBA "normally acceptable" level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Page 4-1524, Site SGH

Site SGH, Utilities Setting, nearest solid waste disposal facility is hereby amended as follows:

Nearest Solid Waste Disposal Facility: ~~Savage Canyon Landfill~~ [EDCO Disposal, 2755 California Ave., Signal Hill](#)

Page 4-1802, Site TWR

The Site TWR Aesthetic Setting section is hereby amended as follows:

State, regional, or municipal recreation area: ~~No~~-Yes

If yes, enter recreation area name: ~~N/A~~ Catalina Island Conservancy Open Space Easement

Page 4-1809, Site TWR

For Site TWR, Biology Setting, the discussion for special status animals recorded within 1 mile, special status plants recorded within 1 mile, and species or habitat present in Project vicinity (generally within 500 Feet) is hereby amended as follows:

Special Status Animals Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); bobtail barley (*Hordeum intercedens*, 3.2, SCI); bright green dudleya (*Dudleya virens* ssp. *hassei*; 1B.2, SCI); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum* ; 1B.2); Catalina Island dudleya (*Dudleya virens* ssp. *Hassei*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); decumbent goldenbush (*Isocoma menziesii* var. *decumbens*; 1B.2); island buckwheat (*Eriogonum grande* var. *grande*; 4.2, SCI); island Jepsonia (*Jepsonia malvifolia*; 4.2, SCI); island poppy (*Eschscholzia ramosa*; 4.3, SCI); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *catalinense*; 1B.2); Santa Catalina Island buckwheat (*Eriogonum giganteum* var. *giganteum*; 4.3, SCI); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *Floribundus*; 1B.2); showy island snapdragon (*Gambelia speciosa*; 1B.2); western dichondra (*Dichondra occidentalis*; 4.2, SCI); Wiggins' cryptantha (*Cryptantha wigginsii*; 1B.2)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

burrowing owl (*Athene cunicularia*; CDFW-SSC); Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&F-EFH); Townsend's big-eared bat – foraging (*Corynorhinus townsendii*; CA-PT; CDFW-SSC); island rush-rose (*Crocantemum greenei*; ESA-T, CNPS-1B.2); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, ESA-CH, CA-E, CNPS-1B.1); round-leaved filaree (*California macrophylla*; CNPS-1B.1); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *catalinense*; CNPS-1B.2); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Wiggins' cryptantha (*Cryptantha wigginsii*; CNPS-1B.2)

Page 4-1813, Site TWR

Impact analysis for Impact CUL-1 is hereby modified as follows:



Mitigation Measure(s):

None required [CUL MM 1](#)

Pages 4-1982 and 4-1983, Site WS1

Site WS1, Question NOI-2, Mitigation Measure(s) is hereby amended as follows:

Mitigation Measure(s):

NOI MM 2

Prior to commencement of construction at site Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

~~NOI MM 3~~

~~Prior to commencement of construction at any site with an applicable noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.~~

**MITIGATION MONITORING PLAN
FOR THE
LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM**



Prepared for:

LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

MARCH 2016

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Pursuant to Public Resources Code section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines, when an agency finds that mitigation measures have been required in, or incorporated into a project, to avoid or substantially lessen its significant environmental effects, the agency must adopt a program for monitoring or reporting on such mitigation measures. The Environmental Impact Report (EIR) prepared for the Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) project identifies mitigation measures to reduce the significant environmental effects of the proposed project. This Mitigation Monitoring Plan (MMP) is prepared in compliance with CEQA and is designed to aid the LA-RICS Joint Powers Authority (Authority) in their implementation and monitoring of the adopted mitigation measures. The LA-RICS Authority is the designated lead agency for purposes of CEQA compliance and is responsible for implementation of the MMP. The MMP will be used by Authority staff responsible for ensuring compliance with mitigation measures associated with the LMR project. Monitoring will consist of review of appropriate documentation, such as plans and reports prepared by the Contractor, or field observation of the mitigation measures during implementation. The MMP will be in place throughout all phases of development of the LMR project. The MMP is presented in table format and describes the actions that must take place to implement each mitigation measure, the entities responsible for implementing the actions, the timing of those actions, and the entities responsible for monitoring compliance. Not all mitigation measures are applicable at every site analyzed in the EIR. The MMP identifies the sites at which specific mitigation measures are applicable.

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
Aesthetics	PASPD01	CUL MM 5: Architectural Resources Protection and Camouflage: See Below	Contractor	Prior to Construction	Authority
Air Quality	All Sites In SCAQMD	AQ MM 1: No later than 12:00 p.m. on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) if combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which USEPA regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NO _x emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.	Contractor	Weekly	Authority
Biological Resources	All sites	BIO MM 1 Mitigation Monitoring and Reporting Plan: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, coordination with the land management agency(s), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.	Authority	Prior to construction	Not applicable
	All sites	BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement, including coordination with the respective land management agency, a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources. a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the proposed Project site. Training of additional workers, contractors, and visitors shall be provided, as needed. b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices, that include containment of any spills, disposal of trash, and management of runoff and sediment transport. c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site.	Authority	a) Prior to construction b) Prior to construction c) Prior to construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
	AGH, AJT, BJM, BUR1,CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	BIO MM 3 Biological Compliance Reporting: A biological monitor shall visit all active construction sites at least once weekly to document compliance and provide reports to the Project administrator on a weekly basis.	Contractor	Weekly during construction	Authority
	BJM, BUR1, CPK, DPK, FRP, GMT, H-17A, JOP, JPK, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, RIH, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WMP, WTR	BIO MM 4 Site Sanitation: a) The contractor shall keep a regulated work area free of litter and trash. Trash and discarded food items shall be contained within an appropriate receptacle and removed daily to avoid attracting wildlife to the construction site, contribute to habituation of wildlife to the presence of humans, or to attract avian or mammalian predators to the area. b) All construction debris (including nuts, bolts, small pieces of wire, etc.) shall be cleaned up (e.g., trash removed, scrap materials picked up) each day that work is conducted to minimize the likelihood of wildlife visiting the site and consuming microtrash, discarded food, or other substances.	Contractor	a) Daily during construction b) Daily during construction	Authority
	BJM, BUR1, DPK, FRP, GMT, JOP, JPK, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TPK, TWR, VPK, WMP, WTR	BIO MM 5 Hazardous Materials Management: a) A toxic substance management and spill response plan shall be prepared by the contractor for review and approval by the Authority. b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately. c) All construction vehicles are required to carry at least one spill response kit. d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.	Contractor	a) Prior to construction b) Daily during construction c) Daily during construction d) During construction, upon occurrence	Authority
	BJM, BUR1, DPK, FRP, FTP, GMT, JOP, JPK, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	BIO MM 6 Anti-perch Devices: Anti-perch devices shall be affixed to any elevated, horizontal structure (this includes the top quarter-arc of disc antennas) suitable for perching or nesting by raptors, ravens, vultures, gulls, or other large birds to deter the use of these facilities as perch or nest sites to avoid attracting avian predators to the area, and so as not to contribute to the habituation of condors to the presence of humans. Anti-perch devices shall be inspected annually and repaired as needed.	Contractor during construction Authority during operation phase	During construction Annually during operation	Authority
	BUR1, FRP, GMT, JOP, JPK, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TPK, VPK, WMP, WTR	BIO MM 7 California Condor Protection: a) As part of BIO MM 4 Site Sanitation, a written list of procedures shall be established and posted on site and/or kept in a site binder at all times. Specifically, the protocol shall list requirements including: all trash of any size shall be placed and contained in covered containers; and no trash of any kind shall be released to the environment. This includes any food items, small or large pieces of plastic or wire, and any small metallic objects (i.e., nuts, bolts, wire nuts). b) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of California condors. A qualified biologist shall prepare an informational handout to be presented at WEAP instruction. This program and handout shall provide, at a minimum, information concerning the biology and distribution of the California condor, legal status, and possible occurrence in the vicinity; measures to avoid impacts to condors; procedures to be implemented to eliminate microtrash from the site; and what to do in case of California condor encounters. The informational handout shall be posted at the Project site for continued reference by construction and maintenance workers. c) During construction and operations of the facility, all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the Project site. If condors are on site, USFWS would be	Contractor	a) Prior to construction b) Prior to construction c) Daily during construction and operations d) Daily during construction e) Daily during construction f) Daily during construction and operations g) Daily during construction h) Weekly during construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>contacted immediately (Ventura office: 805-644-1766) following internal chain-of-command communications protocol. Once condors leave on their own accord or as a result of techniques employed by permitted USFWS personnel, on-site work may continue.</p> <p>d) If condors are known to be present in the area and found roosting within 0.5 mile of the Project site, no construction activity shall occur between one hour before sunset and one hour after sunrise or until the condors leave the area.</p> <p>e) If condors are documented nesting within 1.5 miles of a proposed Project site (as determined by nesting bird surveys, observations by the biological monitor, and/or information from USFWS condor program), no construction activity shall occur until further authorization is received from USFWS.</p> <p>f) The Project site shall be maintained in a clean condition at all times.</p> <p>g) All wires, cables, and other items, either temporary or permanent, that could entangle a condor are to be securely fastened down or removed from site. No permanent guy wires will be used.</p> <p>h) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that the Project site is maintained in a clean condition.</p>			
	AGH, AJT, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LCP, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	<p>BIO MM 8 Biological Monitoring:</p> <p>A qualified biological monitor shall be present at the site during construction activities that result in ground disturbance or removal of vegetation to ensure all mitigation measures are met. Duties of the biological monitor include checking for the presence of wildlife on the construction site, inspecting trenches or holes for trapped wildlife, surveying for the presence of nesting birds and adherence to nesting bird protection buffers, monitoring construction site boundaries, and checking that vegetation flagged for protection is not disturbed.</p>	Contractor	Daily during construction	Authority
	AGH, AJT, BJM, CPK, DPK, ENC1, FRP, FTP, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR	<p>BIO MM 9 Protect Native Vegetation and Common Wildlife:</p> <p>a) Minimize disturbance to native perennial plants; new ground disturbance shall be the minimum necessary and established and delineated prior to any earth-moving activities.</p> <p>b) If native perennial vegetation cannot be avoided and would be impacted or destroyed, the disturbance area is to be surveyed for the presence of special status plants and to remove common species of wildlife prior to destruction of the vegetation.</p> <p>c) At no time shall protected species be handled or moved. If a protected species is found within the construction area, all work that may impact that animal shall cease and the appropriate agency(s) shall be contacted (e.g., USFWS, CDFW, land management agency). The animal shall be allowed to leave the site on its own accord.</p> <p>d) Prior to construction or any ground-disturbance activities, mark the construction disturbance limits and monitor for adherence to these boundaries.</p> <p>e) Stay on existing roads.</p> <p>f) Do not remove native trees; construction limits shall be established to avoid walnuts, oaks, and any other sensitive species habitat and the limits shall be flagged by a biological monitor.</p> <p>g) Protect tree root systems by precluding paving, trenching, or other ground disturbing activities; and preclude heavy equipment from driving, parking, or staging within the tree's dripline.</p> <p>h) Any loss of native perennial vegetation, whether planned or unintentional, is to be accounted for in reports prepared by the biological monitor.</p>	Contractor	<p>a) Daily during construction</p> <p>b) Prior to construction</p> <p>c) Continuous during construction</p> <p>d) Prior to construction</p> <p>e) Continuous during construction and operation</p> <p>f) Prior to construction</p> <p>g) Continuous during construction</p> <p>h) Continuous during construction</p>	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
	BJM, CPK, DPK, FRP, GRM, H-17A, JOP, LACFCP11, LEPS, LPC, MMC, MML, MTL2, PHN, PMT, PWT, PWT, RIH, SDW, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WMP, WTR, ZHQ	BIO MM 10 No Pets: Construction and maintenance workers shall be prohibited from bringing pets (especially dogs) to non-urban Project sites, as the domestic animal may harass or kill native wildlife present at the site.	Contractor	Continuous during construction	Authority
	AGH, AJT, BJM, CPK, DPK, FRP, FTP, GRM, H-17A, JOP, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WMP, WTR	BIO MM 11 Site Access: a) On access roads operate all vehicles within the posted speed limits. b) If access road speed limits are not posted, do not exceed 15 miles per hour (mph). c) Adjust vehicle speed as appropriate to road conditions; avoid causing ruts and gullies; and minimize dust. d) Watch for wildlife on roads (including amphibians, snakes, rodents, and tortoises), especially during rainy periods, and avoid running them over. e) Look under parked vehicles for the presence of wildlife (especially desert tortoise) before pulling away to avoid running over wildlife. f) Do not park on or drive over native perennial vegetation. g) Avoid cutting corners on access roads and impacting vegetation when large equipment and trailers are brought to the Project site. h) Do not drive off the designated roadway or make any modifications to the road or road shoulders.	Contractor	Continuous during construction and operation	Authority
	H-17A, LEPS, PHN, PWT, RIH, SDW, VPK	BIO MM 12 Coastal California Gnatcatcher Protection: a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation. b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection. c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed. d) At proposed Project sites H-17A, PHN, and RIH, a higher level of protection is required to ensure that gnatcatchers are not present when construction activities would occur and adverse effects would be avoided. For proposed Project sites that include known or suspected gnatcatcher nesting or otherwise include suitable nesting habitat where the bird is expected to be present, the following mitigation measure is to ensure the highest level of protection to the bird. All the above measures (BIO MM 1 through BIO MM 3, and BIO MM 8 through BIO MM 12) apply as well as: BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions.	Contractor	a) Prior to construction b) Prior to construction c) Weekly during construction	Authority
	H-17A, PHN, RIH, SDW	BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions: Construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation shall be precluded between February 15 and August 30. This measure is applicable to identified Project sites where coastal California gnatcatchers are known to be or likely would be present, and construction activities may result in disturbance to the bird.	Contractor	Continuous during construction occurring February 15 – August 30	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
	LEPS, PWT	<p>BIO MM 14 Coastal California Gnatcatcher Protocol Surveys:</p> <p>a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/ Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).</p> <p>b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the proposed Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.</p> <p>c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the proposed Project site, construction activities may commence beginning July 1 through February 14.</p> <p>d) Survey requirements shall be applied each year that construction activities take place at the Project site.</p>	Contractor	<p>a) Prior to construction</p> <p>b) Continuous during construction</p> <p>c) Continuous during construction</p> <p>d) Annually during operation</p>	Authority
	LACFCP11	<p>BIO MM 15 Southwestern Willow Flycatcher Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of southwestern willow flycatchers in the area and the importance of maintaining riparian vegetation.</p> <p>b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially riparian species (e.g., sycamore, cottonwood, willow), would be minimized; no ground-disturbing activities or removal of vegetation would occur within stream corridors or floodplains. Prior to construction, surveys for the presence of riparian vegetation shall be conducted by a qualified biologist, and those plants within or near the construction zone not identified for removal shall be marked for protection and monitored for adherence to these boundaries.</p>	Contractor	<p>a) Prior to construction</p> <p>b) Prior to construction</p>	Authority
	ZHQ	<p>BIO MM 16 Snowy Plover Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of western snowy plover in the area and the importance of not disturbing nesting birds.</p> <p>b) If construction occurs between February 1 and July 31, prior to beginning construction a biological monitor shall verify through coordination with USFWS and on-site surveys that no breeding western snowy plovers are using the Project site or are within 500 feet of any Project activity.</p> <p>c) If plovers are nesting in the vicinity, BIO MM 8 Biological Monitoring would apply, and a 500-foot protection buffer shall be required where no construction activities may occur while birds remain in the area.</p>	Contractor	<p>a) Prior to construction</p> <p>b) Prior to construction, if construction occurs between February 1 and July 31</p> <p>c) Continuous during construction</p>	Authority
	AGH, AJT, BJM, CPK, DPK, ENC1, FTP, GMT, H-17A, JOP, OAT, PWT, SPN, TOP, TPK, TWR, VPK, WTR	<p>BIO MM 17 Raptor Protection:</p> <p>a) If construction activities occur during the American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl breeding period, January 1 through July 31, preconstruction surveys would be conducted in all suitable habitats within 500 feet of the Project site as well as within a species-appropriate distance beyond the 500-foot buffer based on line of sight between potential nesting habitat and the construction site.</p>	Contractor	<p>a) Prior to construction during breeding season (January 1 through July 31)</p> <p>b) Prior to construction</p> <p>c) Continuous during construction</p> <p>d) Continuous during construction</p>	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<ul style="list-style-type: none"> b) If construction takes place during the breeding period, the biological monitor shall contact appropriate land management and resource agencies to ascertain if they have any current information on raptor nesting activities in the general vicinity of the proposed Project sites. c) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered within 500 feet of the construction site, work shall not be undertaken at that site until the nest is no longer active, with an additional five days to allow the fledging birds to disperse. An active nest is defined as one that is attended, built, maintained, or used by a pair of birds during a given breeding season, whether or not eggs are laid; a nest is considered inactive if not attended to for a period of 10 days or longer. d) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered between 500 feet and 0.5 mile of the construction site, the potential for disturbance of the nesting birds would be evaluated based on line-of-sight, degree of potentially disturbing activities, and other site-specific factors. If the CDFW and land management agency concur, the protection buffer distance may be reduced. 			
	All sites	<p>BIO MM 18 Nesting Bird Protection:</p> <ul style="list-style-type: none"> a) It is preferred that removal of trees or large tree limbs and other vegetation removal activities such as grubbing or shrub clearing avoid the typical bird nesting season of January 1 through September 15. b) If construction activities occur during the bird nesting season, and to prevent disturbance to or destruction of nests of protected native bird species that could occur as a result of vegetation removal, disturbance, or other on-site construction activities, preconstruction surveys for nesting birds shall be conducted by a qualified biological monitor within 10 calendar days prior to on-site construction-related disturbance activities from March 1 through September 15 for non-raptors, and January 1 through July 31 for raptors. c) If nesting protected non-raptor species are detected, a 300-foot avoidance buffer shall be implemented; a 500-foot avoidance buffer would be applied to any active nest of a raptor or other species of special status bird. d) Appropriate site-specific buffers may be established with the approval of a project designated avian expert, based in part on the species of nesting bird present, location of nest, nesting phenology, magnitude of potential disturbance, and other site conditions (e.g., levels of ambient noise; line-of-sight). e) If construction activities would occur within the general buffer distances for active nests (300 feet for non-raptors, 500 feet for raptors, and up to 1.5 miles for condors and eagles), a Biological Monitor must be present during those activities. f) No active nests may be destroyed; inactive bird nests may be destroyed as part of vegetation removal but may not be reduced to possession. g) Between September 16 and December 30, grubbing, shrub clearing, and tree/limb removal activities are not subject to restrictions based on the protection of migratory birds. h) Comply with the USFWS Office of Migratory Birds voluntary guidelines (USFWS 2013a) for communications tower placement, construction, and operation. i) For any towers that must exceed 199 feet in height, lighting requirements would be designed in cooperation with FAA and USFWS Office of Migratory Birds to minimize attraction and resulting mortality of migratory birds. 	Contractor	<ul style="list-style-type: none"> a) Continuous, prior to and during construction b) Prior to construction c) Prior to construction d) Prior to construction e) Prior to construction f) Prior to construction g) During construction (Sept. 16 – Dec. 31) h) Continuous, prior to and during construction i) Prior to construction 	Authority
	AGH, AJH, BJM, CPK, DPK, FRP, FTP, GRM, H-17A, JOP, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2, TOP, TPK, TWR, WMP, WTR	<p>Bio MM 19 Trenches and Holes Management:</p> <ul style="list-style-type: none"> a) The contractor shall cover or backfill all trenches the same calendar day they are opened, where practicable. 	Contractor	Continuous during construction	Authority

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Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<ul style="list-style-type: none"> b) If trenches or holes cannot be closed the same day they are made, covers shall be firmly secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor. c) Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped common wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species (e.g., arroyo toad) at Project sites that require the presence of a biological monitor. d) If a protected wildlife species is present in the trench, the on-site Biological Monitor shall contact USFWS immediately, ensure the protected species is not in immediate danger, and wait for instruction by USFWS. e) Covered trenches and holes at sites where biological monitors are present are to be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day. f) In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized. g) Prior to trenching, the construction disturbance limits and monitor for adherence to these boundaries shall be marked. 			
	BJM, DPK, TWR	<p>BIO MM 20 Santa Catalina Island Fox Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of the Santa Catalina Island fox and the measures to be taken to avoid impacts to the fox. b) Prior to initiation of construction activities, the Project site plus a 250-foot buffer shall be inspected by a qualified biologist for the presence of Santa Catalina Island fox dens; if a den is located, no construction activities may be initiated and USFWS and CDFW shall be contacted. c) As part of the BIO MM 8 Biological Monitoring, the biological monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of foxes each day prior to initiation of on-site work. Construction equipment that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) shall be inspected prior to moving. 	Contractor	<ul style="list-style-type: none"> a) Prior to construction b) Prior to construction c) Continuous during construction 	Authority
	CPK, FRP, GRM, JOP, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TOP, WMP, WTR	<p>BIO MM 21 Protected Amphibian Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of protected amphibians (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) in the area and along access roads, and the measures to be taken to avoid impacts to these amphibians. b) As part of BIO MM 1 Biological Monitoring, the Biological Monitor shall be present during site preparation and placement of Project equipment. The monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of protected amphibians each day prior to initiation of on-site construction work following a measureable rain event (≥ 0.01 inch) while construction is ongoing. c) To protect dispersing frogs and toads, no Project-related on-site ground-disturbing activities or construction-related travel on access roads shall occur during the night or during rainy periods (within 24 hours of a measureable ≥ 0.01 inch precipitation event or within 48 hours of a major ≥ 0.1 inch precipitation event). d) To protect dispersing frogs and toads during normal site operations (non-emergency situations), these Project sites shall not be accessed by maintenance workers during the night or during rainy periods (within 24 hours of a measureable ≥ 0.01 inch precipitation event or within 48 hours of a major ≥ 0.1 inch precipitation event) (emergency situations are exempted). e) If a protected amphibian (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) is found within 50 feet of the construction site, all work that involves moving vehicles or ground disturbance shall cease until the animal moves on its own accord. 	Contractor	<ul style="list-style-type: none"> a) Prior to construction b) Continuous during construction c) Continuous during construction d) Continuous during construction and operations e) Continuous during construction f) Continuous during construction 	Authority

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Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		f) If protected amphibians are present on the road, vehicles shall stop until the individual(s) move out of harm's way on their own accord.			
	ENC1, LACF072, LEPS, TOP, WAD	<p>BIO MM 22 Monarch Butterfly Protection:</p> <p>a) Preconstruction surveys by a qualified biologist shall provide for a thorough examination of suitable roost trees to determine if butterflies are using the site for roosting; surveys shall be repeated once a week throughout the construction period.</p> <p>b) If butterflies are found roosting in the area, a protection buffer of 50 feet shall be established around each roost; and no construction activities would be undertaken within the buffer area while butterflies are roosting.</p> <p>c) Loss of trees or removal of large limbs on trees that may provide suitable roost habitat for monarch butterflies shall be avoided.</p>	Contractor	<p>a) Prior to construction, and weekly during construction</p> <p>b) Continuous during construction</p> <p>c) Prior to construction, and continuous during construction</p>	Authority
	AGH, AJT, BJM, CPK, DPK, ENC1, FRP, FTP, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, TOP, TWR, VPK, WTR	<p>BIO MM 23 Prevent the Spread of Nonnative Vegetation:</p> <p>a) All ground disturbed by construction activities that would not be paved, landscaped, or otherwise permanently stabilized (e.g., graveled, soil compaction) shall be seeded using species native to the Project vicinity.</p> <p>b) To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be inspected at the equipment storage facility to remove soil and vegetation; and the equipment shall be washed prior to entering the construction site.</p> <p>c) To prevent invasive species seeds from leaving the site, all construction equipment shall be inspected, and all attached plant/vegetation and soil/mud debris shall be removed prior to leaving the construction site.</p>	Contractor	<p>a) Post construction</p> <p>b) Continuous during construction</p> <p>c) Continuous during construction</p>	Authority
	AGH, BJM, CPK, DPK, ENC1, FRP, GRM, H-17A, JOP, JPK, LACF072, LEPS, LPC, MTL2, PMT, PWT, RIH, SPN, TOP, TWR, VPK, WTR	<p>BIO MM 24 Special Status Plants Surveys and Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed prior to the onset of construction activities of the possible presence of special status plants in the area and the importance of maintaining native vegetation.</p> <p>b) At identified sites, surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities, in the proper season and in suitable habitat surrounding the proposed Project site or any area subject to ground disturbance, including access roads.</p> <p>c) If a special status plant is found to be present or if surveys are determined to be inconclusive, the areas requiring special protection would be marked prior to construction to provide a buffer to maintain the ecological context of the location at which the plant was found.</p> <p>d) Mitigation measure BIO MM 8 Biological Monitoring shall apply at proposed Project sites where special status plants or their habitat are present, and protection buffers would be monitored for compliance.</p>	Contractor	<p>a) Prior to construction within the proper season</p> <p>b) Prior to construction</p> <p>c) Prior to construction</p> <p>d) Continuous during construction</p>	Authority
Cultural Resources	AGH, BJM, DPK, ENC1, LEPS, PWT, TOP, TWR, ZHQ	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources</p> <p>At Project sites with known or potential presence of prehistoric archaeological material (artifacts and/or features) within the defined APEs, qualified archaeological or Native American monitors shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined in Section 3.4.3.4. The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm. In the event that prehistoric archaeological material is unexpectedly discovered within the APE, the procedures set forth in CUL MM 3 shall be followed.</p>	Contractor	Continuous during construction for all ground-disturbing activities.	Authority

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Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
	LPC	<p>CUL MM 2: Archaeological Monitoring – Historic-Age Resources</p> <p>At proposed Project sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section.</p> <p>The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.</p>	Contractor	Continuous during construction for all ground-disturbing activities.	Authority
	AGH, ENC1, LEPS, LPC, PASPD01, PWT, TOP, ZHQ	<p>CUL MM 3: Unexpected Discovery of Archaeological Materials</p> <p>In the event that previously unidentified prehistoric or historic-age archaeological resources are uncovered, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. The qualified archaeological monitor will mark the immediate area with highly visible flagging and immediately notify the Project Archaeologist. 2) The Project Archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms, and no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the Project Archaeologist shall evaluate the resource and determine whether it is (1) eligible for inclusion in the NRHP and is thus a historic property for the purposes of the NHPA and NEPA; (2) eligible for the CRHR and thus a historical resource for the purposes of CEQA; (3) a “unique” archaeological resource as defined by CEQA; (4) a Tribal resource as defined by AB 52. If the resource is determined not to be significant under any of these four categories, work may commence in the area following collection (as appropriate) and recording, including mapping and photography, of the archaeological materials or features. 4) If the resource meets the criteria for any or all of the categories described in CUL MM3 (3), work shall remain halted, and the Project Archaeologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse changes occur. Preservation in place (i.e., avoidance) is the preferred method of ensuring no substantial adverse impacts occur on historic properties/historical resources and shall be required unless other equally effective methods are agreed upon among the Project Archaeologist, the Authority, and any other stakeholders. <p>If the archaeological material appears to represent a site – defined as three or more artifacts and/or features in an intact deposit – an archaeological test program (Phase II) may be necessary. Associated mitigation measures include, but are not limited to, collection of the archaeological materials, recordation (e.g., DPR Primary Record and Site Forms), and analysis of any significant cultural materials in accordance with a Data Recovery Plan, and curation of artifacts at an approved curation facility. A curation agreement for this Project is already in place with the University of California, Los Angeles, Archaeological Collections Facility at the Fowler Museum. At the</p>	Contractor	Continuous during construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>completion of the appropriate mitigation measures, a professional-level technical report shall be filed with the appropriate California Historical Resources Information System (CHRIS) Information Center (IC).</p> <p>5) Work at the project location may commence upon completion of the appropriate mitigation treatment(s).</p>			
	AGH, ENC1, LEPS, PWT, TOP, ZHQ	<p>CUL MM 4: Unexpected Discovery of Human Remains</p> <p>In the event that human remains are unexpectedly encountered, the following procedures shall immediately be followed. This guidance is also provided on the NAHC's website at http://nahc.ca.gov/resources/discovery-of-native-american-human-remains-what-to-do/.</p> <ol style="list-style-type: none"> 1) All construction activity shall stop immediately, and the Project Archaeologist shall be notified. The Project Archaeologist will contact the Los Angeles (or applicable) County Coroner. The list of California Coroners can be found on the Native American Heritage Commission's website at http://nahc.ca.gov/2015/06/implementation-of-ab52-sample-letters-request-for-formal-notification-and-request-for-consultation/. 2) The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. 3) The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. 4) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. 5) If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; 6) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission. 	Contractor	Continuous during construction	Authority
	LPC, PASPD01, WAD	<p>CUL MM 5: Architectural Resources Protection and Camouflage</p> <p>Attachment of Equipment to Historic Buildings and Structures</p> <p>For historic buildings or structures where communications-related equipment will be attached, the following preservation practices shall be employed, as applicable, to ensure that impacts are less than significant:</p> <ol style="list-style-type: none"> 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an area on the side of the building where it will be hidden by an existing architectural feature. 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, nonpenetrating mounts shall be used. 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment. 	Contractor submits plan to Authority for approval	Prior to construction and continuous during construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable.</p> <p>5) Any supports or brackets for new equipment shall be color-matched to the existing materials.</p> <p>6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.</p> <p>7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.</p> <p>8) Rust-resistant mounts to prevent staining of the building materials shall be used.</p> <p>9) Reversible mounting techniques shall be used to avoid damage to building materials.</p> <p>10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.</p> <p>11) New interior wiring shall utilize space in existing chases, closets, or shafts.</p> <p>12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.</p> <p>13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.</p> <p>Architectural Camouflage</p> <p>All new towers and monopoles or a proposed increase in the height of existing towers and monopoles that would cause adverse visual impacts on historical resources that are adjacent or within the viewshed shall be camouflaged. All camouflage implemented for the proposed Project shall be sympathetic to the existing landscape (http://www.generalcode.com/codification/sample-legislation/cell-towers) and/or in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_06-07-11.pdf). Tower disguises may include, but are not limited to, painting and various types of concealments, including clock/water towers, flag/light poles, silos, trees, and unique site-specific designs. Such measures must be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above).</p>			
	<p>AGH, AJT, ASD, CPK, GRM, H-17A, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ</p>	<p>CUL MM 6: Potential Paleontological Resources Plan</p> <p>A Paleontological Resources Monitoring Plan shall be developed and approved prior to construction to guide the activities of monitors during ground-disturbing activities. The plan would include, but not be limited to, a description of the project location, the regulatory framework, site-specific impact mitigation requirements designed to reduce impacts to less than significant, specific locations and construction activities requiring monitoring and/or spot checking, procedures to follow for construction monitoring and fossil discovery and recovery, and a repository agreement with the Natural History Museum of Los Angeles County or other accredited repository. Mitigation measures that may be implemented to ensure that impacts to paleontological resources would be reduced to less than significant may include but are not limited to the following:</p>	<p>Contractor</p>	<p>Prior to construction and continuous during construction</p>	<p>Authority</p>

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>a) Worker awareness training on paleontological resources presented to construction personnel prior to the start of construction. The training should include at minimum, the following:</p> <ul style="list-style-type: none"> • The types of fossils that could occur at the project site • The procedures that should be taken in the event of a fossil discovery • Laws protecting paleontological resources • Penalties for destroying or removing paleontological resources <p>b) Paleontological monitoring during ground disturbance at all sites with moderate/unknown or high paleontological potential</p> <p>c) Salvage of significant fossil resources</p> <p>d) Screenwashing of matrix samples for microfossils</p> <p>e) Laboratory preparation of recovered fossils to the point of identification and curation</p> <p>f) Identification of recovered fossils to the lowest possible taxonomic order</p> <p>g) Curation of significant fossils at the Natural History Museum of Los Angeles County or other accredited repository</p> <p>h) Preparation of a final monitoring report that includes at a minimum the dates of field work, results of monitoring, fossil analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens.</p> <p>The Plan shall be submitted to the Authority for review and approval and finalized at least 14 days prior to the start of construction.</p>			
	<p>AGH, AJT, ASD, CPK, GRM, H-17A, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, TOP, WS1, ZHQ</p>	<p>CUL MM 7: Paleontological Resources Monitoring</p> <p>Paleontological monitoring shall be conducted by a qualified paleontological monitor who has demonstrated experience in the collection and salvage of fossil materials. An undergraduate degree in geology or paleontology is preferable but is less important than documented experience performing paleontological monitoring and mitigation. The monitor will work under the supervision of a Principal Paleontologist.</p> <p>The qualified professional paleontological monitor shall be present during ground disturbance at all sites with moderate/unknown or high paleontological potential, and as specified in the Paleontological Resources Monitoring Plan prepared in accordance with CUL MM 6. The monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Any sites that require monitoring or mitigation within the Angeles National Forest will require a qualified paleontologist to have a U.S. Department of Agriculture Forest Service-Temporary Special-Use Permit for paleontology. Based on the specific site conditions observed during monitoring (type of sediment impacted, previous disturbances, nature of site conditions), the Principal Paleontologist may reduce or increase monitoring efforts in consultation with the Agency.</p> <p>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) All ground-disturbing work within 50 feet of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. Work shall not resume in the discovery area until authorized by the qualified paleontologist. 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area. 	<p>Contractor</p>	<p>During construction</p>	<p>Authority</p>

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards.</p> <p>5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist to screen matrix test samples on-site during monitoring. Additionally, bulk matrix samples may be collected and transported to a laboratory facility for processing.</p> <p>6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository.</p> <p>7) All recovered fossils shall be curated at the Natural History Museum of Los Angeles County, or a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.</p>			
Geology and Soils	AGH, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	<p>GEO MM 1 : Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the Contractor shall:</p> <p>1) Submit to the appropriate municipality (County of Los Angeles, County of San Bernardino, or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall:</p> <ul style="list-style-type: none"> a. include an analysis of the expected ground motions at the site from known active faults using accepted methodologies b. include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013. c. Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as: <ul style="list-style-type: none"> i. subsurface soil improvement ii. deep foundations extending below the liquefiable layers iii. structural slabs designed to span across areas of non-support iv. soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones v. dynamic compaction vi. compaction grouting vii. jet grouting viii. mitigation for liquefaction hazards suggested in the California Geological Survey's (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater 	Contractor	Prior to construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicated displacements</p> <p>d. Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults</p> <p>e. Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements</p> <p>2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations.</p> <p>3) The project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements.</p> <p>4) Site construction shall not begin until:</p> <p>a. The registered geotechnical engineer representing the applicable permitting municipality for the project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and</p> <p>b. The applicable permitting municipality for the project site (county or city) has reviewed all project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements</p>			
	PDC	<p>HAZ MM 1: Prior to construction activity, the construction contractor shall prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.</p> <ul style="list-style-type: none"> Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities. If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required. If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety. If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered. The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed. 	Contractor	Prior to construction	Authority
	SDW	<p>HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation."</p>	Contractor	Prior to construction	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
		<p>The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460-1, Notice of Proposed Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.</p> <p>Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460-1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.</p>			
	AGH, AJT, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SIM, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	<p>HAZ MM 3: Fire Management Plan.</p> <p>Prior to construction activity, the Authority shall work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.</p>	Authority	Prior to construction	Authority
Noise	ENC1, LACF072	<p>NOI MM 1: Prior to commencement of construction at sites ENC1 and LACF072, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available. Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible. Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately. 	Contractor	<ul style="list-style-type: none"> Prior to construction and continuous during construction 	Authority
	WS1	<p>NOI MM 2: Prior to commencement of construction at Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers. Use well-maintained equipment and have equipment inspected regularly. Operate construction equipment for periods of fewer than 15 consecutive minutes when possible. 	Contractor	<ul style="list-style-type: none"> Prior to start of construction and continuous during construction 	Authority
Transportation	ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, ZHQ	<p>TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.</p>	Contractor	<ul style="list-style-type: none"> Continuous during construction Prior to start of construction 	Authority

Mitigation Monitoring Plan

Resource Area	Sites	Mitigation Measure	Responsible Implementation Party	Phase and Frequency (frequency is once unless otherwise noted)	Monitoring Agency
	ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, ZHQ	TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.	Contractor	<ul style="list-style-type: none"> Prior to construction 	Authority
Utilities/Service Systems	AGH, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ	UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit shall be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.	Contractor	Prior to construction	Authority

**LOS ANGELES REGIONAL INTEROPERABILITY
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM**

Findings of Fact and Statement of Overriding Considerations



Prepared for:

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March 2016

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Acronyms and Abbreviations

Acronym/Abbreviation	Term
AB	California Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
ALUP	Airport Land Use Plan
APE	Area of Potential Effect
ASTM	American Society for Testing and Materials
Authority	Joint Powers Authority
B.A.	Bachelor of Arts degree
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CNDDDB	California Natural Diversity Database
County	Los Angeles County
COW	cell on wheels
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DHS	Department of Homeland Security
DPR	California Department of Parks and Recreation
DPS	distinct population segment
EIR	Environmental Impact Report
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FRP	fiberglass reinforced plastic
FTA	Federal Transit Administration
GHG	greenhouse gas
HCP	habitat conservation plan
IC	Information Center
LACDPW	Los Angeles County Department of Public Works
LA-RICS	Los Angeles Regional Interoperable Communication System
LMR	Land Mobile Radio
MHz	Megahertz
MMRP	Mitigation Monitoring and Reporting Plan
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOC	network operations center
NO _x	nitrogen oxides
NOP	Notice of Preparation
NRHP	National Register of Historic Places
O ₃	Ozone

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Acronym/Abbreviation	Term
ppv	peak particle velocity
PRC	Public Resources Code
Project	the LA-RICS LMR Project
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
TOWAIR	FCC landing slope facility calculator tool
UBC	Uniform Building Code
UHF	ultra high frequency
U.S.	United States
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
WEAP	Worker Environmental Awareness Program

1.0 Introduction

1.1 Certification

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES REGIONAL INTEROPERABILITY COMMUNICATIONS SYSTEM (LA-RICS) LAND MOBILE RADIO (LMR) SYSTEM (STATE CLEARINGHOUSE NUMBER 2014081025)

The LA-RICS Board hereby certifies the EIR for the LA-RICS LMR System, State Clearinghouse Number 2014081025. The EIR consists of the Draft EIR, dated January 2016 and Final EIR, dated March 2016. The EIR has been completed in compliance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. The LA-RICS Board has received, reviewed, and considered the information contained in the Final EIR, all hearings, and submissions of testimony from officials representing the County of Los Angeles, as well as from other agencies, organizations, and private individuals with a particular vested interest in the ordinances.

In accordance with CEQA Guidelines Section 15090, the Governing Board of the LA-RICS Joint Powers Authority, as lead agency pursuant to CEQA, certifies the following:

- (a) The Final EIR has been completed in compliance with CEQA;
- (b) The Final EIR was presented to the LA-RICS Board, and the LA-RICS Board, as the decision-making body for the LA-RICS Joint Powers Authority, reviewed and considered the information contained in the Final EIR prior to approving the Project;
- (c) The Final EIR reflects the LA-RICS Joint Powers Authority's independent judgment and analysis.

The LA-RICS Joint Powers Authority has exercised independent judgment in accordance with Public Resources Code (PRC) Section 21082.1(c) in retaining its own environmental consultant; directing the consultant in preparation of the EIR; and reviewing, analyzing, and revising material prepared by the consultant. These Findings of Fact (Findings) and Statement of Overriding Considerations have been prepared in accordance with CEQA (Public Resources Code Division 13 Sections 21000-21178) and the State CEQA Guidelines (Title 14 California Code of Regulations section 15000 et seq.). The purpose of these Findings is to satisfy the requirements of PRC Section 21081 and Title 14 California Code of Regulations (CCR) Sections 15090, 15091, 15092, 15093, and 15097 of the State CEQA Guidelines, in connection with the approval of an alternative to construct and operate the LMR System.

Having received, reviewed, and considered the foregoing information and recommendations of the LA-RICS staff, as well as any and all other information in the record and Chapter 1 herein, the LA-RICS Board for the Joint Powers Authority hereby makes Findings pursuant to and in accordance with Section 21081

of the Public Resources Code as presented in Chapters 2 through 6 of these Findings of Fact and Statement of Overriding Considerations.

1.2 Project

The proposed Project as described in the Draft EIR is the installation, and operation of LMR facilities at up to 90 sites; however, the Authority considered a total of 94 sites to provide alternate site locations if some sites subsequently were determined not to be viable during site feasibility assessments, system engineering, geotechnical evaluations, and permitting process or in lease agreement discussions with the property owner. Of these 94 sites, the Authority previously determined that 40 sites are statutorily exempt from CEQA under PRC Section 21080.25, the statutory CEQA exemption adopted specifically for LA-RICS, which, as discussed in Section 1.3.2 of the Draft EIR, exempts certain elements of LMR System from CEQA review so long as they meet certain criteria set forth in the exemption. The Draft EIR includes the remaining 54 sites that did not qualify for the statutory CEQA exemption.

Following publication of the Draft EIR and consideration of all comments received on the Draft EIR, and in light of additional feasibility determinations and design considerations, the Authority has identified 73 sites, out of the 94 originally under consideration, for construction as part of the LMR system. Twenty-nine (29) of these sites are among those statutorily exempt sites already approved by the Authority. The remaining forty four (44) sites analyzed in the EIR, listed in Table 1-1, are the subject of these Findings.

Table 1-1: LMR Project Sites Analyzed in EIR and Identified for Construction

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
AGH	Agoura Hills	Unnamed road – nearest intersection Kimberly Dr.	Agoura Hills	91301	Agoura Hills
AJT	AeroJet	Unnamed road – nearest intersection Woodview Rd.	Chino Hills	91709	Chino Hills
ASD	Auto Square Drive	18605 Studebaker Rd.	Cerritos	90703	Cerritos
BJM	Black Jack Peak	Near Airport Rd.	Santa Catalina Island	90704	Los Angeles County
BUR1	Burnt Peak – 1	Angeles National Forest Pine Canyon Rd. to 7N23A	Three Points/Lake Hughes	93532	USFS
CPK	Castro Peak	928 Latigo Canyon Rd.	Malibu	90063	Los Angeles County
DPK	Dakin Peak	Avalon Canyon Rd.	Santa Catalina Island	90704	Los Angeles County
ENC1	Encinal 1 (Fire Camp 13)	1250 S. Encinal Canyon Rd.	Malibu	90265	Los Angeles County

Table 1-1: LMR Project Sites Analyzed in EIR and Identified for Construction

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
FRP	Frost Peak (Upper Blue Ridge)	Blue Ridge Rd. 3N06	Wrightwood	92397	USFS
FTP	Flint Peak	3600 Linda Vista Rd.	Glendale	91206	Glendale
GMT	Grass Mountain	San Francisquito Rd. to 6N04	Green Valley	91390	USFS
GRM	Green Mountain	Temescal Canyon Fire Rd.	Los Angeles	90272	Los Angeles
H-17A	H-17A	Intersection of Ridge Fire Rd. and Tank Fire E Rd.	Whittier	90601	Whittier
JOP	Josephine Peak	Angeles Forest Hwy/ Josephine Peak Road	Clear Creek/above La Cañada Flintridge	91011	USFS
JPK	Johnstone Peak - 1	Angeles National Forest	San Dimas	91741	USFS
LACF072	County FS 72	1832 S. Decker Rd.	Malibu	90265	Los Angeles County
LACFCP11	County CP 11	8800 W. Soledad Canyon Rd.	Santa Clarita	91350	USFS
LARICSHQ	LA-RICS Headquarters Building	2525 Corporate Place	Monterey Park	91754	Monterey Park
LEPS	Lower Encinal Pump Station	Intersection of Camino De Buena Ventura and Avenida De La Encinal	Malibu	90265	Malibu
LPC	Loop Canyon	Angeles National Forest – off Forest Route 3N17	Santa Clarita	91350	USFS
MMC	Mount McDill	Sierra Pelona West Mountainway	Palmdale	91390	Palmdale
MML	Magic Mountain Link	Santa Clarita Divide Rd.	above Santa Clarita	91387	USFS
MTL2	Mount Lukens-2	5150 Mount Lukens Truck Trail	Los Angeles	91011	USFS
OAT	Oat Mountain-1	Palo Sola Truck Rd.	Chatsworth	91311	Los Angeles County
PASPD01	Pasadena Police Department	214-290 Ramona St.	Pasadena	91101	Pasadena

Table 1-1: LMR Project Sites Analyzed in EIR and Identified for Construction

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
PDC	Pacific Design Center	8687 Melrose Ave.	West Hollywood	90069	West Hollywood
PHN	Puente Hills	Near Vantage Point Dr.	Rowland Heights	91748	Los Angeles County
PMT	Pine Mountain	Hwy 39 to 2N24	above Azusa	91702	USFS
PWT	Portshead Tank	5961 S. Cavalleri Rd.	Malibu	90265	NPS
RIH	Rio Hondo	Near Workman Mill Rd.	Whittier	90601	Los Angeles County
SDW	San Dimas	310 Via Blanca	San Dimas	91773	San Dimas
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill
SIM	Simpsons' Building	Building 42, Fox Lot, 10201 West Pico Blvd.	Los Angeles	90064	Los Angeles County
SPN	Saddle Peak	24574 W. Saddle Peak Rd.	Malibu	90265	Los Angeles County
SUN	Sunset Ridge	Angeles National Forest	above Claremont	91711	USFS
TOP	Topanga Peak	Topanga Tower Mountain Way	Topanga	90290	Los Angeles County
TPK	Tejon Peak	37407 Gorman Post Rd.	Gorman	93243	Los Angeles County
TWR	Tower Peak	Banning House Rd.	Santa Catalina Island	90704	Los Angeles County
VPK	Verdugo Peak-2	Unnamed road - nearest intersection Hostetter Fire Rd.	Glendale	91214	Glendale
WAD	Walker Drive	409 Walker Dr.	Beverly Hills	90210	Beverly Hills
WMP	Whitaker Middle Peak	Whitaker Fire Rd.; Angeles National Forest	Castaic Lake	91384	USFS
WS1	100 Wilshire	100 Wilshire Blvd.	Santa Monica	90401	Santa Monica
WTR	Whittaker Ridge	Whitaker Fire Rd.; Angeles National Forest	Castaic Lake	91384	USFS
ZHQ	Zuma Life Guard HQ	30050 Pacific Coast Highway	Malibu	90265	Malibu

2.0 LA RICS – Land Mobile Radio System Project

2.1 Project Objectives

The Los Angeles region is designated as a high-threat area by the Department of Homeland Security (DHS). The LMR system would provide emergency responders with an improved communications system for an efficient and coordinated response to incidents and emergencies that presently is not possible in Los Angeles County.

Effective radio communication is critical in helping police officers prevent and respond to crimes, keeping firefighters safe as they fight blazes, facilitating life-saving exchanges of information between emergency medical service professionals and hospitals, and allowing public works and utility providers the opportunity to coordinate responses to disasters and special events. LMR would support a rapid, safe, and effective response during daily operations. Additionally, it would support a faster, better-coordinated, large-scale response to emergencies such as wildfires, earthquakes, civil disturbance, or other disasters. It would replace the existing aging patchwork of LMR systems with a single county-wide network and would improve overall system capacity and coverage for first and second responders region-wide.

In addition, most public safety entities currently use a portion the radiofrequency spectrum (ultra-high frequency [UHF] T-Band frequency spectrum at 470 to 512 megahertz [MHz]) that the Federal Communications Commission (FCC) has mandated be vacated by 2023. The LMR system would allow for phase-out of use of the UHF T-Band and transition to the use of the 700-MHz spectrums.

The objectives of the LMR Project are:

- 1) provide day-to-day voice and narrowband data radio communications for first and second emergency responders in the Los Angeles region;
- 2) enable interoperability among member agencies and mutual aid providers ;
- 3) support communication with regional, state, and federal agencies in the event of a natural or man-made disaster;
- 4) improve emergency communications within Los Angeles County;
- 5) add capacity, replace existing aging infrastructure with infrastructure that meets current building codes and telecommunications industry standards that better support modern technology, and provide for more technologically advanced equipment;
- 6) lessen the amount of interference resulting from multiple systems on the same tower by providing greater separation of different radio frequencies;
- 7) provide greater frequency flexibility and increase overall system coverage and capacity by providing greater separation of different radio frequencies; and

- 8) allow for transition from use of the UHF T-Band to the 700-MHz spectrum as mandated by the FCC.

2.2 Project Overview

The LMR system would consist of sites located in Los Angeles County and in adjacent portions of San Bernardino County in southern California that would contain the infrastructure and equipment necessary to provide voice communications coverage throughout Los Angeles County for emergency responders. The LMR Project would be a modern, integrated wireless voice and narrowband data communications system to serve law enforcement, fire service, health service, and public works professionals throughout Los Angeles County. The new system would provide day-to-day communications within and among agencies and allow seamless interagency communications for responding to routine, emergency, and catastrophic events. The LMR system would be composed of four different subsystems:

- 1) Digital Trunked Voice Radio System — provides first responders with radio communications utilizing digital technology. It seamlessly operates on two bands of spectrum (700 MHz and UHF)
- 2) Analog Conventional Voice Radio System — provides first responders with radio communications utilizing conventional analog technology
- 3) Los Angeles Regional Tactical Communications System — consists of local, state, and federal interoperability channels in four different bands of the spectrum in order to allow outside agencies responding to events in the County to have designated channels for communications
- 4) Narrowband Mobile Data Network — a data system that provides critical dispatch communications

The LMR system was designed to provide voice coverage throughout the Authority’s service area, which extends throughout Los Angeles County, with the fewest number of sites possible. Some LMR sites are outside Los Angeles County at locations with sufficient elevation and clear line of sight to achieve increased coverage within Los Angeles County. Locations were selected within or adjacent to existing communications facilities to the maximum extent feasible. The sites include a variety of types (e.g., water tanks, rooftops, police and fire stations, hospitals, mountain peaks, etc.). Most of these locations have existing communications equipment but do not necessarily have communication towers.

The LMR Project would include one or more network operations centers (NOCs) to provide for LMR system monitoring. The NOCs would have the capability of assessing equipment performance and remotely or locally managing the equipment and network to prevent degradation or failure of performance. The NOC(s) would operate 24 hours per day, seven days per week. NOC equipment would be installed internally in an existing facility, such as an existing commercial or public safety facility.

A detailed description of the site components, types, construction, and operation and maintenance is provided in Chapter 2 of the Draft EIR.

2.3 Summary of CEQA Compliance

A Notice of Preparation (NOP) of a Draft EIR accompanied by an Initial Study was distributed to the California State Clearinghouse and to other public agencies on August 26, 2014. The review period for the Initial Study was from August 26 to September 24, 2014. Scoping meetings were held September 11 through September 18, 2014, at the following California communities: Diamond Bar, Lancaster, Woodland Hills, San Pedro, and Lynwood.

Comments received on the Initial Study and during the scoping meetings were addressed in the Draft EIR where applicable.

The Authority published a Notice of Availability (NOA) for the Draft EIR on January 11, 2016, initiating a 45-day public review and comment period that ended on February 25, 2016. The State Agency review period ended on February 28, 2016. The NOA was published on the LA-RICS website (<http://www.la-rics.org/wp-content/uploads/2016/01/LA-RICS-LMR-DEIR-NOA-FINAL.pdf>). The availability of the Draft EIR and the dates of public meetings were advertised in the *Los Angeles Times* and other local newspapers.

Public meetings were hosted by the LA-RICS Authority from January 25 through February 16 in the following communities in California:

- Walnut: Walnut Senior Center, Assembly Room
21215, La Puente Road, Walnut CA
Monday January 25, 2016, 6:30 p.m.
- Canoga Park: Canoga Park Branch Library, Meeting Room
20939 Sherman Way, Canoga Park, CA 91303
Tuesday January 26, 2016, 6:30 p.m.
- Culver City: Culver City Veterans Memorial Building, Multipurpose Room
4117 Overland Ave., Culver City, CA 90230
Wednesday January 27, 2016, 6:30 p.m.
- Lancaster: Jane Reynolds Activity Center, Activity room
716 Oldfield St., Lancaster CA 93534
Thursday January 28, 2016, 6:30 p.m.
- San Pedro: Peck Park Community center, Auditorium
560 N. Western Ave. San Pedro, CA 90732
Tuesday February 2, 2016, 6:30 p.m.

- Avalon: Catalina Country Club, Dining Room
1 Country Club Drive, Avalon CA 90704
Monday February 16, 2016, 4:00 p.m.

A Final EIR for the project has been prepared in compliance with CEQA. The Final EIR includes the Draft EIR, incorporates and responds to comments received on the Draft EIR, and includes corrections and clarifications to the Draft EIR.

3.0 CEQA Findings

3.1 Findings Regarding Environmental Impacts Determined to be Less Than Significant or No Impact

3.1.1 Aesthetics

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, PWT, RIH, SDW, SGH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.1 and applicable site summary forms in Chapter 4 of the Draft EIR, which is incorporated by reference herein. Construction and operation of the Project at these sites would not have a substantial adverse effect on scenic vistas.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.1 and applicable site summary forms in Chapter 4 of the Draft EIR, which is incorporated by reference herein. Construction and operation of the Project at all sites would not substantially damage scenic resources.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PDC, PHN, PMT, PWT, RIH, SDW, SGH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.1 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not substantially degrade existing visual quality or character at these sites or their surroundings.

AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rational for Finding: The above finding is made based on the analysis in Draft EIR Section 3.1 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at all sites would not create a new substantial source of light or glare.

3.1.2 Air Quality

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Sites: FRP, MMC

Finding: At the sites identified above, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.2 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not conflict with or obstruct implementation of the applicable air quality plan.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Sites: FRP, MMC

Finding: At the sites identified above, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.2 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by

reference herein. Construction and operation of the Project at these sites would not violate any air quality standard or contribute substantially to any air quality violation.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Sites: FRP, MMC

Finding: At the sites identified above, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.2 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not result in cumulatively considerable net increases of any criteria pollutant.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.2 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at all sites would not expose sensitive receptors to substantial pollutant concentrations.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.2 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at all sites would not result in objectionable odors that would affect a substantial number of people.

3.1.3 Biological Resources

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in

local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or on any species that meets the criteria in CEQA Guidelines Section 15380 for endangered, rare or threatened?

Sites: ASD, LARICSHQ, PDC, SIM, WS1

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would have no impact either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) or any species meeting criteria in CEQA guidelines 15380 for endangered, rare, or threatened.

BIO-2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sites: ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, GMT, JPK, LARICSHQ, MMC, MTL2, PASPD01, PDC, PMT, PWT, SGH, SIM, SPN, SUN, TOP, TWR, VPK, WAD , WS1, WTR

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by CDFW or USFWS.

BIO-3. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by

reference herein. Construction and operation of all sites would not result in substantial adverse effects on federally protected wetlands.

BIO-4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or impeded the use of native wildlife nursery sites.

BIO-5. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Sites: AGH, ASD, FTP, H-17A, LARICSHQ, MMC, PASPD01, PDC, SDW, SGH, SIM, VPK, WAD , WS1

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not conflict with local policies or ordinances protecting biological resources.

BIO-6. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.3 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other local, regional or state habitat conservation plan.

3.1.4 Cultural Resources

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CCR §15064.5?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11 LARICSHQ, LEPS, MMC, MML, MTL2, OAT, PDC, PHN, PMT, RIH, SDW, SGH, SIM, SPN, SUN, TPK, TWR, VPK, WMP, WS1, WTR,

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.4 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not cause a substantial adverse change in the significance of a historical resource.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CCR § 15064.5?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11 LARICSHQ, LEPS, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, RIH, SDW, SGH, SIM, SPN, SUN, TPK, TWR, VPK, WAD ,WMP, WS1, WTR,

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.4 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not cause a substantial adverse change in the significance of an archaeological resource.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Sites: BJM, BUR1, DPK, ENC1, FRP, FTP, GMT, JOP, JPK, LACF072, LACFCP11, LPC, MMC, MML, MTL2, PMT, SUN, TPK, TWR, VPK, WAD ,WMP, WTR,

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.4 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would have no impact on unique paleontological resources or unique geologic features.

CUL-4: Would the project disturb any human remains, including those interred outside formal cemeteries?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, RIH, SDW, SGH, SIM, SPN, SUN, TPK, TWR, VPK, WAD, WMP, WS1, WTR

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.4 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would have no impacts on any human remains, including those interred outside formal cemeteries.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in PRC Section 21074?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, RIH, SDW, SGH, SIM, SPN, SUN, TPK, TWR, VPK, WAD, WMP, WS1, WTR

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.4 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not impact Tribal cultural resources as defined in PRC Section 21074.

3.1.5 Geology / Soils

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Strong seismic ground shaking?

Seismic-related ground failure, including liquefaction?

Landslides?

Sites: AJT, LARICSHQ, PDC, SIM, WS1

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.5 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not expose people or structures to potential substantial adverse effects, including risk of loss, injury, or death, associated with faults, strong seismic shaking, seismic-related ground failure, or landslides.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.5 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at all sites would not result in substantial soil erosion or loss of topsoil.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Sites: AGH, AJT, BJM, BUR1, DPK, ENC1, FRP, GMT, JOP, LACF072, LARICSHQ, LPC, MMC, MML, OAT, PASPD01, PHN, PMT, PWT, SGH, SIM, SUN, TPK, TWR, WMP, WS1, WTR

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.5 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not be located on a geologic unit or soil that is unstable or would become unstable as a result of the project.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.5 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not create substantial risks to life and property due to expansive soils identified in Table 18-1-B of the Uniform Building Code (UBC).

3.1.6 Green House Gases

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.6 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not directly or indirectly generate greenhouse gases (GHGs) that would result in a significant impact on the environment.

GHG-2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.6 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with any plan, policy, or regulation adopted for the purposes of reducing GHG emissions.

3.1.7 Hazards and Hazardous Materials

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by

reference herein. Construction and operation of all Project sites would not create a significant hazard to the public or environment through routine transport, use, or disposal of hazardous materials.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions resulting in a release of hazardous materials into the environment.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Only two sites (LARICSHQ and PSDPD01) are located within 0.25 mile of an existing or proposed school. Construction and operation of all sites would not emit hazardous emissions. The use, transport, and disposal of hazardous materials, substances, or wastes will comply with federal, state, and local regulations.

HAZ-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. The Project, at the sites identified above, would not be constructed or operated on hazardous material sites listed pursuant to Government Code Section 65962.5.

HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, PWT, RIH, SGH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not result in a safety hazard for people because the sites are not located within 2 miles of a public airport or public use airport.

HAZ-6: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not result in a safety hazard for people because the sites are not within the vicinity of a private airstrip.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not impair

implementation of or physically interfere with an adopted emergency response or evaluation plan.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Sites: ASD, LARICSHQ, PASPD01, PDC, SGH, WS1

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.7 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

3.1.8 Hydrology / Water Quality

WQ-1: Would the project violate any water quality standards or waste discharge requirements?

Sites: AJT, LARICSHQ, PDC, SGH, SIM WAD, WS1

Finding: At the sites identified above, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not violate any water quality standard or waste discharge requirement.

WQ-2: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

WQ-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not substantially alter existing drainage patterns of the site or area that would result in substantial erosions or siltation on or off site.

WQ-4: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not substantially alter existing drainage patterns of the site or area that would substantially increase surface runoff in a manner that would result in flooding on or off site.

WQ-5: Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not create or contribute to runoff water which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

WQ-6: Would the project otherwise substantially degrade water quality?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not otherwise substantially degrade water quality.

WQ-7: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not place structures within a 100-year flood hazard area that would impede or redirect flood flows.

WQ-8: Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not expose people or structures to a significant risk or loss, injury, or death involving flooding.

WQ-9: Would the project expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, RIH, SDW, SGH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.8 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at these Project sites would not expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow.

3.1.9 Land Use

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.9 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the , adopted for the purpose of avoiding or mitigating an environmental effect.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.9 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with any applicable HCP or NCCP.

3.1.10 Noise

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.10 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not expose persons to generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WMP, WTR

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.10 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at these Project sites would not expose persons to or the generation of excessive groundborne vibration or noise levels.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Sites: AGH, AJT, ASD, BJM, BUR1, CPK, DPK, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WMP, WTR

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.10 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at these Project sites would not result in a substantial temporary or periodic increase in ambient noise levels above levels existing without the project.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.10 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not expose people residing or working in the area to excessive noise levels.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.10 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would not expose people residing or working in the area to excessive noise levels.

3.1.11 Recreation

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.11 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not increase the use of existing neighborhood or regional parks or other recreational facilities.

3.1.12 Transportation / Traffic

TRANS-1: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.12 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system.

TRANS-2: Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.12 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not conflict with an applicable congestion management program.

TRANS-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Sites: AGH, AJT, ASD, BUR1, CPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LARICSHQ, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PDC, PHN, PMT, PWT, RIH, SIM, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WS1, WTR, ZHQ

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.12 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not result in a change in air traffic patterns.

TRANS-4: Would the project result in inadequate emergency access?

Sites: AGH, AJT, BJM, BUR1, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, JOP, JPK, LACF072, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, TOP, TPK, TWR, VPK, WAD, WMP, WTR

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.12 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not result in inadequate emergency service.

3.1.13 Utilities / Service Systems

UTL-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Sites: AJT, LARICSHQ, PDC, SGH SIM, WAD, WS1

Finding: At the sites identified above, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.13 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of the Project at these sites would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB).

UTL-2: Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.13 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would not require or result in construction of new or expansion of existing stormwater drainage facilities.

UTL-3: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in either no impact or less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.13 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would have sufficient water supplies based on existing entitlements and resources and would not require new or expanded entitlements.

UTL-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in less than significant impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.13 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation at all Project sites would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

UTL-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Sites: All sites identified in Table 1-1.

Finding: At all sites identified in Table 1-1, the Project would result in no impacts.

Rationale for Finding: The above finding is made based on the analysis in Draft EIR Section 3.13 and applicable site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. Construction and operation of all Project sites would comply with federal, state, and local solid waste statutes and regulations.

3.2 Findings Regarding Environmental Impacts Determined to Be Significant but Would Be Mitigated to a Less Than Significant Level

3.2.1 Aesthetics

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Sites: PASPD01 (discussed at Draft EIR, Pg. 4-1219)¹

Site PASPD01 is within the City of Pasadena’s historic civic center area. The project includes a new 70-foot monopole with attached antennas, along with the associated equipment and equipment shelter. These elements would not be compatible with the civic center’s distinctive Beaux Arts architectural style and feeling. The new structures would represent another “abandonment of architectural standards” that would not be consistent with the setting that led to formation of the historic district. Impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in the Section 3.1 of the Final EIR and site summary form in Chapter 4 of the DEIR. These changes are set forth in **Mitigation Measure CUL MM 5: Architectural Resources Protection and Camouflage (see Section 3.2.4).**

Rationale for Finding: Architectural Resources Protection and Camouflage shall be sympathetic to the existing landscape, and visually compatible with the surrounding architecture, and acceptable to the property owner and/or host community and minimizing degradation of the character and quality of the site and surrounds. Implementation of CUL MM 5 would mitigate degradation of the existing visual character and quality associated with the construction and operation of the PASPD01 to below the level of significance.

3.2.2 Air Quality

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN

¹ Unless otherwise noted, all page numbers refer to pages in the Draft EIR that contain relevant site-specific analysis, which is incorporated by reference herein.

(Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WS1 (Pg. 4-1952), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Simultaneous construction of all these Project sites located in the South Coast Air Basin (SCAB) would exceed significance thresholds for nitrogen oxides (NO_x), a precursor for ozone (O₃), and could conflict with or obstruct implementation of the South Coast Air Quality Management District (SCAQMD) Plan. Impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.2 and in the site summary forms in Chapter 4 of the Draft EIR. These changes are set forth in **Mitigation Measure AQ MM 1** below.

AQ MM 1: No later than 12:00 p.m. on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NO_x emissions from all construction activities at all Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) if combined NO_x emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which USEPA regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NO_x emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

Rationale for Finding: The contractor will be required to forecast Project emissions based on actual equipment that would be operating. Data would be provided and verified by the Authority, and no exceedance of NO_x standards will be permitted. Implementation of AQ MM 1 would mitigate air emission from Project site construction so that the Project would not conflict or obstruct implementation with the SCAQMD Plan. Implementation of Mitigation Measure AQ MM 1 would reduce construction emissions to below the level of significance.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WS1 (Pg. 4-1952), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Simultaneous construction of these sites located in the SCAB would exceed significance thresholds for NO_x, a precursor for O₃, and would result in violation of the SCAQMD threshold for daily NO_x emissions during construction and would contribute to the SCAB nonattainment status for O₃. Impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.2 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure AQ MM 1** previously discussed above under AQ-1.

Rationale for Finding: The contractor will be required to forecast Project emissions based on actual equipment that would be operating. Data would be provided and verified by the Authority; and no exceedance of NO_x standards will be permitted, which would ensure NO_x emissions do not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Implementation of Mitigation Measure AQ MM 1 would reduce construction emissions to below the level of significance.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN

(Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WS1 (Pg. 4-1952), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Simultaneous construction of these sites located in the SCAB would exceed significance thresholds for NO_x, a precursor for O₃, and would result in cumulatively considerable net increases in O₃ from the NO_x emissions. Impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.2 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure AQ MM 1** previously discussed above under AQ-1.

Rationale for Finding: The contractor will be required to forecast Project emissions based on actual equipment that would be operating. Data would be provided and verified by the Authority, and no exceedance of NO_x standards will be permitted; therefore, the Project would not result in a cumulatively considerable net increase in any pollutant for which the SCAB is in nonattainment. Implementation of Mitigation Measure AQ MM 1 would reduce construction emissions to below the level of significance.

3.2.3 Biological Resources

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or on any species that meets the criteria in CEQA Guidelines Section 15380 for endangered, rare or threatened?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

The analysis included the review of 112 special status plant species and 74 special status wildlife species to determine potential impacts due to construction or operations at any of these Project sites. Impacts to special status species would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.3 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures BIO MM 1 through BIO MM 24** below.

BIO MM 1 Mitigation Monitoring and Reporting Plan

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, coordination with the land management agency(s), and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the Project.

BIO MM 2 Worker Environmental Awareness Program

Prior to construction, the Authority shall develop and implement, or require the system contractor to develop and implement, including coordination with the respective land management agency, a Worker Environmental Awareness Program (WEAP) for the Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

- a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the Project site. Training of additional workers, contractors, and visitors shall be provided, as needed.
- b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices that include containment of any spills, disposal of trash, and management of runoff and sediment transport.

- c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site.

BIO MM 3 Biological Compliance Reporting

A biological monitor shall visit all active construction sites at least once weekly to document compliance and provide reports to the Project administrator on a weekly basis.

BIO MM 4 Site Sanitation

- a) The contractor shall keep a regulated work area free of litter and trash. Trash and discarded food items shall be contained within an appropriate receptacle and removed daily to avoid attracting wildlife to the construction site, contribute to habituation of wildlife to the presence of humans, or to attract avian or mammalian predators to the area.
- b) All construction debris (including nuts, bolts, small pieces of wire, etc.) shall be cleaned up (e.g., trash removed, scrap materials picked up) each day that work is conducted to minimize the likelihood of wildlife visiting the site and consuming microtrash, discarded food, or other substances.

BIO MM 5 Hazardous Materials Management

- a) A toxic substance management and spill response plan shall be prepared by the contractor for review and approval by the Authority.
- b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately.
- c) All construction vehicles are required to carry at least one spill response kit.
- d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.

BIO MM 6 Anti-perch Devices

Anti-perch devices shall be affixed to any elevated, horizontal structure (this includes the top quarter-arc of disc antennas) suitable for perching or nesting by

raptors, ravens, vultures, gulls, or other large birds to deter the use of these facilities as perch or nest sites to avoid attracting avian predators to the area, and so as not to contribute to the habituation of condors to the presence of humans. Anti-perch devices shall be inspected annually and repaired as needed.

BIO MM 7 California Condor Protection

- a) As part of BIO MM 4 Site Sanitation, a written list of procedures shall be established and posted on site and/or kept in a site binder at all times. Specifically, the protocol shall list requirements including: all trash of any size shall be placed and contained in covered containers; and no trash of any kind shall be released to the environment. This includes any food items, small or large pieces of plastic or wire, and any small metallic objects (i.e., nuts, bolts, wire nuts).
- b) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of California condors. A qualified biologist shall prepare an informational handout to be presented at WEAP instruction. This program and handout shall provide, at a minimum, information concerning the biology and distribution of the California condor, legal status, and possible occurrence in the vicinity; measures to avoid impacts to condors; procedures to be implemented to eliminate microtrash from the site; and what to do in case of California condor encounters. The informational handout shall be posted at the Project site for continued reference by construction and maintenance workers.
- c) During construction and operations of the facility, all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the Project site. If condors are on site, USFWS would be contacted immediately (Ventura office: 805-644-1766) following internal chain-of-command communications protocol. Once condors leave on their own accord or as a result of techniques employed by permitted USFWS personnel, on-site work may continue.
- d) If condors are known to be present in the area and found roosting within 0.5 mile of the Project site, no construction activity shall occur between one hour before sunset and one hour after sunrise or until the condors leave the area.
- e) If condors are documented nesting within 1.5 miles of a Project site (as determined by nesting bird surveys, observations by the biological monitor, and/or information from USFWS condor program), no

construction activity shall occur until further authorization is received from USFWS.

- f) The Project site shall be maintained in a clean condition at all times.
- g) All wires, cables, and other items, either temporary or permanent, that could entangle a condor are to be securely fastened down or removed from site. No permanent guy wires will be used.
- h) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that the Project site is maintained in a clean condition.

BIO MM 8 Biological Monitoring

A qualified biological monitor shall be present at the site during construction activities that result in ground disturbance or removal of vegetation to ensure all mitigation measures are met. Duties of the biological monitor include checking for the presence of wildlife on the construction site, inspecting trenches or holes for trapped wildlife, surveying for the presence of nesting birds and adherence to nesting bird protection buffers, monitoring construction site boundaries, and checking that vegetation flagged for protection is not disturbed.

BIO MM 9 Protect Native Vegetation and Common Wildlife

- a) Minimize disturbance to native perennial plants; new ground disturbance shall be the minimum necessary and established and delineated prior to any earth-moving activities.
- b) If native perennial vegetation cannot be avoided and would be impacted or destroyed, the disturbance area is to be surveyed for the presence of special status plants and to remove common species of wildlife prior to destruction of the vegetation.
- c) At no time shall protected species be handled or moved. If a protected species is found within the construction area, all work that may impact that animal shall cease and the appropriate agency(s) shall be contacted (e.g., USFWS, CDFW, land management agency). The animal shall be allowed to leave the site on its own accord.

- d) Prior to construction or any ground-disturbance activities, mark the construction disturbance limits and monitor for adherence to these boundaries.
- e) Stay on existing roads.
- f) Do not remove native trees; construction limits shall be established to avoid walnuts, oaks, and any other sensitive species habitat and the limits shall be flagged by a biological monitor.
- g) Protect tree root systems by precluding paving, trenching, or other ground disturbing activities; and preclude heavy equipment from driving, parking, or staging within the tree's dripline.
- h) Any loss of native perennial vegetation, whether planned or unintentional, is to be accounted for in reports prepared by the biological monitor.

BIO MM 10 No Pets

Construction and maintenance workers shall be prohibited from bringing pets (especially dogs) to non-urban Project sites, as the domestic animal may harass or kill native wildlife present at the site.

BIO MM 11 Site Access

- a) On access roads operate all vehicles within the posted speed limits.
- b) If access road speed limits are not posted, do not exceed 15 miles per hour (mph).
- c) Adjust vehicle speed as appropriate to road conditions; avoid causing ruts and gullies; and minimize dust.
- d) Watch for wildlife on roads (including amphibians, snakes, rodents, and tortoises), especially during rainy periods, and avoid running them over.
- e) Look under parked vehicles for the presence of wildlife (especially desert tortoise) before pulling away to avoid running over wildlife.
- f) Do not park on or drive over native perennial vegetation.
- g) Avoid cutting corners on access roads and impacting vegetation when large equipment and trailers are brought to the Project site.

- h) Do not drive off the designated roadway or make any modifications to the road or road shoulders.

BIO MM 12 Coastal California Gnatcatcher Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation.
- b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection.
- c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed.
- d) At Project sites H-17A, PHN, and RIH, a higher level of protection is required to ensure that gnatcatchers are not present when construction activities would occur and adverse effects would be avoided. For Project sites that include known or suspected gnatcatcher nesting or otherwise include suitable nesting habitat where the bird is expected to be present, the following mitigation measure is to ensure the highest level of protection to the bird. All the above measures (BIO MM 1 through BIO MM 3, and BIO MM 8 through BIO MM 12) apply as well as:

BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions

Construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation shall be precluded between February 15 and August 30. This measure is applicable to identified Project sites where coastal California gnatcatchers are known to be or likely would be present, and construction activities may result in disturbance to the bird.

BIO MM 14 Coastal California Gnatcatcher Protocol Surveys

- a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).
- b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.
- c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the Project site, construction activities may commence beginning July 1 through February 14.
- d) Survey requirements shall be applied each year that construction activities take place at the Project site.

BIO MM 15 Southwestern Willow Flycatcher Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of southwestern willow flycatchers in the area and the importance of maintaining riparian vegetation.
- b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially riparian species (e.g., sycamore, cottonwood, willow), would be minimized; no ground-disturbing activities or removal of vegetation would occur within stream corridors or floodplains. Prior to construction, surveys for the presence of riparian vegetation shall be conducted by a qualified biologist, and

those plants within or near the construction zone not identified for removal shall be marked for protection and monitored for adherence to these boundaries.

BIO MM 16 Snowy Plover Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of western snowy plover in the area and the importance of not disturbing nesting birds.
- b) If construction occurs between February 1 and July 31, prior to beginning construction a biological monitor shall verify through coordination with USFWS and on-site surveys that no breeding western snowy plovers are using the Project site or are within 500 feet of any Project activity.
- c) If plovers are nesting in the vicinity, BIO MM 8 Biological Monitoring would apply, and a 500-foot protection buffer shall be required where no construction activities may occur while birds remain in the area.

BIO MM 17 Raptor Protection

- a) If construction activities occur during the American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl breeding period, January 1 through July 31, preconstruction surveys would be conducted in all suitable habitats within 500 feet of the Project site as well as within a species-appropriate distance beyond the 500-foot buffer based on line of sight between potential nesting habitat and the construction site.
- b) If construction takes place during the breeding period, the biological monitor shall contact appropriate land management and resource agencies to ascertain if they have any current information on raptor nesting activities in the general vicinity of the Project sites.
- c) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered within 500 feet of the construction site, work shall not be undertaken at that site until the nest is no longer active, with an additional five days to allow the fledging birds to disperse. An active nest is defined as one that is attended, built, maintained, or used by a pair of birds during a given breeding season, whether or not eggs are laid; a nest is considered inactive if not attended to for a period of 10 days or longer.

- d) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered between 500 feet and 0.5 mile of the construction site, the potential for disturbance of the nesting birds would be evaluated based on line-of-sight, degree of potentially disturbing activities, and other site-specific factors. If the CDFW and land management agency concur, the protection buffer distance may be reduced.

BIO MM 18 Nesting Bird Protection

- a) It is preferred that removal of trees or large tree limbs and other vegetation removal activities such as grubbing or shrub clearing avoid the typical bird nesting season of January 1 through September 15.
- b) If construction activities occur during the bird nesting season, and to prevent disturbance to or destruction of nests of protected native bird species that could occur as a result of vegetation removal, disturbance, or other on-site construction activities, preconstruction surveys for nesting birds shall be conducted by a qualified biological monitor within 10 calendar days prior to on-site construction-related disturbance activities from March 1 through September 15 for non-raptors, and January 1 through July 31 for raptors.
- c) If nesting protected non-raptor species are detected, a 300-foot avoidance buffer shall be implemented; a 500-foot avoidance buffer would be applied to any active nest of a raptor or other species of special status bird.
- d) Appropriate site-specific buffers may be established with the approval of a Project designated avian expert, based in part on the species of nesting bird present, location of nest, nesting phenology, magnitude of potential disturbance, and other site conditions (e.g., levels of ambient noise; line-of-sight).
- e) If construction activities would occur within the general buffer distances for active nests (300 feet for non-raptors, 500 feet for raptors, and up to 1.5 miles for condors and eagles), a Biological Monitor must be present during those activities.
- f) No active nests may be destroyed; inactive bird nests may be destroyed as part of vegetation removal but may not be reduced to possession.

- g) Between September 16 and December 30, grubbing, shrub clearing, and tree/limb removal activities are not subject to restrictions based on the protection of migratory birds.
- h) Comply with the USFWS Office of Migratory Birds voluntary guidelines (USFWS 2013a) for communications tower placement, construction, and operation.
- i) For any towers that must exceed 199 feet in height, lighting requirements would be designed in cooperation with FAA and USFWS Office of Migratory Birds to minimize attraction and resulting mortality of migratory birds.

BIO MM 19 Trenches and Holes Management

- a) The contractor shall cover or backfill all trenches the same calendar day they are opened, where practicable.
- b) If trenches or holes cannot be closed the same day they are made, covers shall be firmly secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor.
- c) Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped common wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species (e.g., arroyo toad) at Project sites that require the presence of a biological monitor.
- d) If a protected wildlife species is present in the trench, the on-site Biological Monitor shall contact USFWS immediately, ensure the protected species is not in immediate danger, and wait for instruction by USFWS.
- e) Covered trenches and holes at sites where biological monitors are present are to be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day.
- f) In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized.
- g) Prior to trenching, the construction disturbance limits and monitor for adherence to these boundaries shall be marked.

BIO MM 20 Santa Catalina Island Fox Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of the Santa Catalina Island fox and the measures to be taken to avoid impacts to the fox.
- b) Prior to initiation of construction activities, the Project site plus a 250-foot buffer shall be inspected by a qualified biologist for the presence of Santa Catalina Island fox dens; if a den is located, no construction activities may be initiated and USFWS and CDFW shall be contacted.
- c) As part of the BIO MM 8 Biological Monitoring, the biological monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of foxes each day prior to initiation of on-site work. Construction equipment that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) shall be inspected prior to moving.

BIO MM 21 Protected Amphibian Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of protected amphibians (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) in the area and along access roads, and the measures to be taken to avoid impacts to these amphibians.
- b) As part of BIO MM 1 Biological Monitoring, the Biological Monitor shall be present during site preparation and placement of Project equipment. The monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of protected amphibians each day prior to initiation of on-site construction work following a measureable rain event (≥ 0.01 inch) while construction is ongoing.
- c) To protect dispersing frogs and toads, no Project-related on-site ground-disturbing activities or construction-related travel on access roads shall occur during the night or during rainy periods (within 24 hours of a measureable [≥ 0.01 inch] precipitation event or within 48 hours of a major [≥ 0.1 inch] precipitation event).
- d) To protect dispersing frogs and toads during normal site operations (non-emergency situations), these Project sites shall not be accessed by maintenance workers during the night or during rainy periods (within 24 hours of a measureable [≥ 0.01 inch] precipitation event or within 48

hours of a major [≥ 0.1 inch] precipitation event) (emergency situations are exempted).

- e) If a protected amphibian (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) is found within 50 feet of the construction site, all work that involves moving vehicles or ground disturbance shall cease until the animal moves on its own accord.
- f) If protected amphibians are present on the road, vehicles shall stop until the individual(s) move out of harm's way on their own accord.

BIO MM 22 Monarch Butterfly Protection

- a) Preconstruction surveys by a qualified biologist shall provide for a thorough examination of suitable roost trees to determine if butterflies are using the site for roosting; surveys shall be repeated once a week throughout the construction period.
- b) If butterflies are found roosting in the area, a protection buffer of 50 feet shall be established around each roost; and no construction activities would be undertaken within the buffer area while butterflies are roosting.
- c) Loss of trees or removal of large limbs on trees that may provide suitable roost habitat for monarch butterflies shall be avoided.

BIO MM 23 Prevent the Spread of Nonnative Vegetation

- a) All ground disturbed by construction activities that would not be paved, landscaped, or otherwise permanently stabilized (e.g., graveled, soil compaction) shall be seeded using species native to the Project vicinity.
- b) To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be inspected at the equipment storage facility to remove soil and vegetation; and the equipment shall be washed prior to entering the construction site.
- c) To prevent invasive species seeds from leaving the site, all construction equipment shall be inspected, and all attached plant/vegetation and soil/mud debris shall be removed prior to leaving the construction site.

BIO MM 24 Special Status Plants Surveys and Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed prior to the onset of construction activities of the possible presence of special status plants in the area and the importance of maintaining native vegetation.
- b) At identified sites, surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities, in the proper season and in suitable habitat surrounding the Project site or any area subject to ground disturbance, including access roads.
- c) If a special status plant is found to be present or if surveys are determined to be inconclusive, the areas requiring special protection would be marked prior to construction to provide a buffer to maintain the ecological context of the location at which the plant was found.
- d) Mitigation measure BIO MM 8 Biological Monitoring shall apply at Project sites where special status plants or their habitat are present, and protection buffers would be monitored for compliance.

Rationale for Finding: As described in detail in Section 3.3 of the Draft EIR, the Project would avoid substantial adverse effects on species and habitat through worker education, species and habitat identification, avoidance, and monitoring. Implementation of Mitigation Measures BIO MM 1 through BIO MM 24 would reduce construction and operational impacts to below the level of significance.

BIO-2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), FTP (Pg. 4-490), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), OAT (Pg. 4-1181), PHN (Pg. 4-1294), RIH (Pg. 4-1410), SDW (Pg. 4-1448), TPK (Pg. 4-1762), WMP (Pg. 4-1913), ZHQ (Pg. 4-2026)

Riparian habitat or sensitive communities occur within the study area of these sites, as recorded in the California Natural Diversity Database (CNDDB) and/or verified during reconnaissance surveys of each study area. Impacts to these sensitive communities and associated species would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.3 and

in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures BIO MM 1, BIO MM 3, BIO MM 5, BIO MM 6, BIO MM 8 through BIO MM 12, BIO MM 19, BIO MM 23, and BIO MM 24**, previously discussed above under BIO-1.

Rationale for Finding: As described in detail in Section 3.3 of the Draft EIR, the Project would avoid substantial adverse effects on riparian or other sensitive natural communities identified in local or regional plans, policies regulations or by CDFW and USFWS through worker education and species and habitat identification, avoidance, and monitoring. Implementation of BIO MM 1, BIO MM 3, BIO MM 5, BIO MM 6, BIO MM 8 through BIO MM 12, BIO MM 19, BIO MM 23, and BIO MM 24 would reduce construction and operational impacts to below the level of significance.

BIO-5. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Sites: AJT (Pg. 4-38), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), GMT (Pg. 4-528), GRM (Pg. 4-566), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Development of these Project sites would impact biological resources protected by local policies or ordinances; impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.3 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures BIO MM 1 through BIO MM 24**, previously discussed above under BIO-1.

Rationale for Finding: As described in detail in Section 3.3 of the Draft EIR, the Project would avoid biological resources protected by local policies or ordinances through worker education and species and habitat identification, avoidance, and monitoring. Implementation of **BIO MM 1 through BIO MM 24** would reduce construction and operational impacts to below the level of significance.

3.2.4 Cultural Resources

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in PRC §15064.5?

Sites: ENC1 (Pg. 4-372), PASPD01 (Pg. 4-1219), PWT (Pg. 4-1371), TOP (Pg. 4-1722), WAD (Pg. 4-1872), ZHQ (Pg. 4-2026)

Construction of monopoles would cause adverse impacts on archaeological resources located within the vicinity of these Project sites.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 1, CUL MM 3, CUL MM 4, and CUL MM 5** below.

CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources

At Project sites with known or potential presence of prehistoric archaeological material (artifacts and/or features) within the defined APEs, qualified archaeological or Native American monitors shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in Draft EIR Section 3.4 or Chapter 4. The direct and indirect APEs are defined in Section **Error! Reference source not found.**

The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

In the event that prehistoric archaeological material is unexpectedly discovered within the APE, the procedures set forth in CUL MM 3 shall be followed.

CUL MM 3: Unexpected Discovery of Archaeological Materials

In the event that previously unidentified prehistoric or historic-age archaeological resources are uncovered, the following actions shall be taken:

- 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. The qualified archaeological monitor will mark the immediate area with highly visible flagging and immediately notify the Project Archaeologist.

- 2) The Project Archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms, and no further effort shall be required.
- 3) If the resource cannot be avoided and may be subject to further impact, the Project Archaeologist shall evaluate the resource and determine whether it is (1) eligible for inclusion in the NRHP and is thus a historic property for the purposes of the NHPA and NEPA; (2) eligible for the CRHR and thus a historical resource for the purposes of CEQA; (3) a “unique” archaeological resource as defined by CEQA; (4) a Tribal resource as defined by AB 52. If the resource is determined not to be significant under any of these four categories, work may commence in the area following collection (as appropriate) and recording, including mapping and photography, of the archaeological materials or features.
- 4) If the resource meets the criteria for any or all of the categories described in CUL MM 3, work shall remain halted, and the Project Archaeologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse changes occur. Preservation in place (i.e., avoidance) is the preferred method of ensuring no substantial adverse impacts occur on historic properties/historical resources and shall be required unless other equally effective methods are agreed upon among the Project Archaeologist, the Authority, and any other stakeholders.

If the archaeological material appears to represent a site – defined as three or more artifacts and/or features in an intact deposit – an archaeological test program (Phase II) may be necessary. Associated mitigation measures include, but are not limited to, collection of the archaeological materials, recordation (e.g., DPR Primary Record and Site Forms), and analysis of any significant cultural materials in accordance with a Data Recovery Plan, and curation of artifacts at an approved curation facility. A curation agreement for this Project is already in place with the University of California, Los Angeles, Archaeological Collections Facility at the Fowler Museum. At the completion of the appropriate mitigation measures, a professional-level technical report shall be filed with the appropriate California Historical Resources Information System (CHRIS) Information Center (IC).

- 5) Work at the Project location may commence upon completion of the appropriate mitigation treatment(s).

CUL MM 4: Unexpected Discovery of Human Remains

In the event that human remains are unexpectedly encountered, the following procedures shall immediately be followed. This guidance is also provided on the Native American Heritage Commission (NAHC) website at <http://nahc.ca.gov/resources/discovery-of-native-american-human-remains-what-to-do/>.

- 1) All construction activity shall stop immediately, and the Project Archaeologist shall be notified. The Project Archaeologist will contact the Los Angeles (or applicable) County Coroner. The list of California Coroners can be found on the NAHC website at <http://nahc.ca.gov/2015/06/implementation-of-ab52-sample-letters-request-for-formal-notification-and-request-for-consultation/>.
- 2) The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the NAHC.
- 3) The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- 4) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- 5) If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
- 6) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

CUL MM 5: Architectural Resources Protection and Camouflage

Attachment of Equipment to Historic Buildings and Structures

For historic buildings or structures where communications-related equipment will be attached, the following preservation practices shall be employed, as applicable, to ensure that impacts are less than significant:

- 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an area on the side of the building where it will be hidden by an existing architectural feature.
- 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, non-penetrating mounts shall be used.
- 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment.
- 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable.
- 5) Any supports or brackets for new equipment shall be color-matched to the existing materials.
- 6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.
- 7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.
- 8) Rust-resistant mounts to prevent staining of the building materials shall be used.
- 9) Reversible mounting techniques shall be used to avoid damage to building materials.
- 10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the

building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.

- 11) New interior wiring shall utilize space in existing chases, closets, or shafts.
- 12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.
- 13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.

Architectural Camouflage

All new towers and monopoles or an increase in the height of existing towers and monopoles that would cause adverse visual impacts on historical resources that are adjacent to or within the viewshed shall be camouflaged. All camouflage implemented for the Project shall be sympathetic to the existing landscape (<http://www.generalcode.com/codification/sample-legislation/cell-towers>) and/or in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_06-07-11.pdf).

Tower disguises may include, but are not limited to, painting and various types of concealments, including clock/water towers, flag/light poles, silos, trees, and unique site-specific designs. Such measures must be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above).

Rationale for Finding: As described in detail in Section 3.4 of the Draft EIR, Project visual impacts on historical resources within the APE would be minimized by disguising or camouflaging monopoles using paint or architectural screening. Additionally, monitoring during ground disturbing activities would ensure subsurface prehistoric archaeological resources are not disturbed. Implementation of **CUL MM 1**, **CUL MM 3**, **CUL MM 4**, and **CUL MM 5** would reduce construction and operational impacts to below the level of significance.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to PRC § 15064.5

Sites: ENC1 (Pg. 4-372), PWT (Pg. 4-1371), TOP (Pg. 4-1722), ZHQ (Pg. 4-2026)

Based on the location and type of Project activities and the extent of resources at these Project sites, construction impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 1, CUL MM 3, and CUL MM 4**, previously discussed above under CUL-1.

Rationale for Finding: As described in detail in Section 3.4 of the Draft EIR, monitoring during ground disturbing activities ensures that subsurface prehistoric archaeological resources are not disturbed. Implementation of **CUL MM 1, CUL MM 3, and CUL MM 4** would reduce construction and operational impacts to below the level of significance.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), CPK (Pg. 4-296), GRM (Pg. 4-566), H-17A (Pg. 4-604), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN (Pg. 4-1563), TOP (Pg. 4-1722), WS1 (Pg. 4-1952), ZHQ (Pg. 4-2026)

Project activities at these Project sites would have a significant impact on paleontological resources.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 6 and CUL MM 7**, below:

CUL MM 6: Paleontological Resources Monitoring Plan

A Paleontological Resources Monitoring Plan shall be developed and approved prior to construction to guide the activities of monitors during ground-disturbing activities. The plan would include, but not be limited to, a description of the Project location, the regulatory framework, site-specific impact mitigation requirements designed to reduce impacts to less than significant, specific locations and construction activities requiring monitoring and/or spot checking, and procedures to follow for construction monitoring and fossil discovery and recovery, and a repository agreement with the Natural History Museum of Los Angeles County or other accredited repository. Mitigation measures that may

be implemented to ensure that impacts to paleontological resources would be reduced to less than significant may include but are not limited to the following:

- a) Worker awareness training on paleontological resources presented to construction personnel prior to the start of construction. The training should include at minimum, the following:
 - The types of fossils that could occur at the Project site
 - The procedures that should be taken in the event of a fossil discovery
 - Laws protecting paleontological resources
 - Penalties for destroying or removing paleontological resource
- b) Paleontological monitoring during ground disturbance at all sites with moderate/unknown or high paleontological potential
- c) Salvage of significant fossil resources
- d) Screenwashing of matrix samples for microfossils
- e) Laboratory preparation of recovered fossils to the point of identification and curation
- f) Identification of recovered fossils to the lowest possible taxonomic order
- g) Curation of significant fossils at the Natural History Museum of Los Angeles County or other accredited repository
- h) Preparation of a final monitoring report that includes at a minimum the dates of field work, results of monitoring, fossil analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens.

The Plan shall be submitted to the Authority for review and approval and finalized at least 14 days prior to the start of construction.

CUL MM 7: Paleontological Resources Monitoring

Paleontological monitoring shall be conducted by a qualified paleontological monitor who has demonstrated experience in the collection and salvage of fossil materials. An undergraduate degree in geology or paleontology is preferable but is less important than documented experience performing paleontological

monitoring and mitigation. The monitor will work under the supervision of a Principal Paleontologist.

The qualified professional paleontological monitor shall be present during ground disturbance at all sites with moderate/unknown or high paleontological potential, and as specified in the Paleontological Resources Monitoring Plan prepared in accordance with CUL MM 6. The monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Any sites that require monitoring or mitigation within the Angeles National Forest will require a qualified paleontologist to have a U.S. Department of Agriculture Forest Service-Temporary Special-Use Permit for paleontology. Based on the specific site conditions observed during monitoring (type of sediment impacted, previous disturbances, nature of site conditions), the Principal Paleontologist may reduce or increase monitoring efforts in consultation with the Agency.

In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:

- 1) All ground-disturbing work within 50 feet of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. Work shall not resume in the discovery area until authorized by the qualified paleontologist.
- 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.
- 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is "unique" under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area.
- 4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the

resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards.

- 5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist to screen matrix test samples on-site during monitoring. Additionally, bulk matrix samples may be collected and transported to a laboratory facility for processing.
- 6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository.
- 7) All recovered fossils shall be curated at the Natural History Museum of Los Angeles County, or a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.

Rationale for Finding: As described in detail in Section 3.4 of the Draft EIR, paleontological monitoring during ground-disturbing activities to ensure that any paleontological resources identified during are appropriately identified, characterized, and, as applicable, collected ensures that subsurface paleontological resources are not destroyed. Implementation of **CUL MM 6** and **CUL MM 7** would reduce construction and operational impacts to below the level of significance.

CUL-4: Would the project disturb any human remains, including those interred outside formal cemeteries?

Sites: ENC1 (Pg. 4-372), PWT (Pg. 4-1371), TOP (Pg. 4-1722), ZHQ (Pg. 4-2026)

Based on the location and type of Project activities and the extent of resources at these Project sites, construction impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 1, CUL MM 3, and CUL MM 4**, previously discussed above under CUL-1.

Rationale for Finding: As described in detail in Section 3.4 of the Draft EIR, monitoring during ground-disturbing activities is required to ensure that any human remains identified during ground-disturbing activities are appropriately identified, characterized, and reported to the

appropriate authorities. Implementation of **CUL MM 1**, **CUL MM 3**, and **CUL MM 4** would reduce construction and operational impacts to below the level of significance.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074?

Sites: ENC1 (Pg. 4-372), PWT (Pg. 4-1371), TOP (Pg. 4-1722), ZHQ (Pg. 4-2026)

Based on the potential for tribal resources to occur and type of Project activities and the extent of resources at these Project sites, construction impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 1**, **CUL MM 3**, and **CUL MM 4**, previously discussed above under CUL-1.

Rationale for Finding: As described in detail in Section 3.4 of the Draft EIR, monitoring during ground-disturbing activities ensures that any tribal resources identified are appropriately protected. Implementation of **CUL MM 1**, **CUL MM 3**, and **CUL MM 4** would reduce construction and operational impacts to below the level of significance.

3.2.5 Geology / Soils

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Strong seismic ground shaking?

Seismic-related ground failure, including liquefaction?

Landslides?

Sites: AGH (Pg. 4-1), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MMC (Pg. 4-1069), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP

(Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

These sites include new monopoles, new towers, and existing monopoles and towers that would be extended. Seismic shaking impacts would be significant at these sites without an evaluation of site-specific soils, geology, and seismic shaking probability.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.5 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure GEO MM 1**, below.

GEO MM 1 Prior to or concurrently with submittal of the application for a building permit for any portion of the Project site, the Contractor shall:

- 1) Submit to the appropriate municipality (County of Los Angeles or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall:
 - a) Include an analysis of the expected ground motions at the site from known active faults using accepted methodologies
 - b) Include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013.
 - c) Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as:
 - i) subsurface soil improvement
 - ii) deep foundations extending below the liquefiable layers
 - iii) structural slabs designed to span across areas of non-support
 - iv) soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones

- v) dynamic compaction
 - vi) compaction grouting
 - vii) jet grouting
 - viii) mitigation for liquefaction hazards suggested in the California Geological Survey's (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicated displacements
- d) Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults
 - e) Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements
- 2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations.
 - 3) The Project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the Project meet current Building Code requirements.
 - 4) Site construction shall not begin until:
 - a) The registered geotechnical engineer representing the applicable permitting municipality for the Project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and

- b) The applicable permitting municipality for the Project site (county or city) has reviewed all Project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements

Rationale for Finding: As described in detail in Section 3.5 of the Draft EIR, a geotechnical report will be prepared for each of these sites. The report will be prepared in accordance with applicable regulations for the applicable jurisdiction for the location of the Project sites. The geotechnical report will assess site-specific seismic ground-shaking conditions to be considered and make recommendations on the design of the foundation to minimize seismic hazards. Implementation of **GEO MM 1** would reduce construction and operational impacts to below the level of significance.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Sites: ASD (Pg. 4-74), CPK (Pg. 4-296), FTP (Pg. 4-490), GRM (Pg. 4-566), H-17A (Pg. 4-604), JPK (Pg. 4-721), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), MTL2 (Pg. 4-1142), PDC (Pg. 4-1256), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SPN (Pg. 4-1563), TOP (Pg. 4-1722), VPK (Pg. 4-1836), WAD (Pg. 4-1872), ZHQ (Pg. 4-2026)

These sites are located within a designated potential landslide area or designated potential liquefaction zone. The ground under these sites has the potential for soils to become unstable; construction impacts would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure GEO MM 1**, discussed above under GEO-1.

Rationale for Finding: As described in detail in Section 3.5 of the Draft EIR, a geotechnical report will be prepared for each of these sites. The report will evaluate subsurface soil and groundwater condition and make recommendations to ensure soil stability and make recommendations to minimize potential for lateral spreading subsidence, liquefaction, or collapse. Implementation of **GEO MM 1** would reduce construction and operational impacts to below the level of significance.

3.2.6 Hazards and Hazardous Materials

HAZ-4: *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Site: PDC (Pg. 4-1256)

Only Site PDC is located within an area identified as a hazardous materials site. Construction at this facility may include placement of new equipment structure and/or trenching for utilities that will disturb the ground. If potential contamination is not appropriately located and characterized prior to disturbance, disposal of excavated soil could result in a significant impact and create a significant hazard to the public or the environment at Site PDC and, thus, result in a significant impact.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.7 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure HAZ MM 1**, below.

HAZ MM 1: Prior to construction activity, the construction contractor prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing and Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.

- Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by construction activities.
- If construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required.
- If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety.
- If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered.

- The Phase II report should also address appropriate and available disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed.

Rationale for Finding: As described in detail in Section 3.7 of the Draft EIR, prior to construction activities, a Phase I Environmental Assessment will be prepared for the site. Based on the Phase I recommendations, additional sampling, testing, and characterization may be required to ensure proper worker notification, handling, and disposal of contaminated material. Implementation of **HAZ MM 1** would reduce construction and operational impacts to below the level of significance.

HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Site: SDW (Pg. 4-1448)

Site SDW lies within Area E land use, as defined in the Airport Land Use Compatibility Plan (ALUCP) for Brackett Field. The approved Airport Land Use Plan (ALUP) indicates that structures more than 100 feet tall within Area E need to be evaluated by the Federal Aviation Administration (FAA) to determine if the structure creates an air navigation hazard. Construction of the tower may result in a significant navigational hazard.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.7 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure HAZ MM 2**, below.

HAZ MM 2 Prior to issuance of building permits, the Contractor shall submit Form 7460–1 (Notice of Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.”

The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460–1, Notice of Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.

Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460–1, Notice of Construction or Alteration,

to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.

Rationale for Finding: As described in detail in Section 3.7 of the Draft EIR, completion of the FAA process for notice of alteration or construction and, as applicable, incorporating all FAA recommendations into the Project would prevent or minimize any adverse impacts on the safe and efficient use of navigable airspace. Implementation of **HAZ MM 2** would reduce construction and operational impacts to below the level of significance.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MMC (Pg. 4-1069), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SIM (Pg. 4-1526), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

These Project sites are either located within or, in the case of sites on federal land, presumed to be within a Very High Fire Hazard Severity Zone. Construction activities in these areas represent an elevated significant risk of igniting a wildland fire.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in the Draft EIR Section 3.7 and site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure HAZ MM 3**, below.

HAZ MM 3: Fire Management Plan. Prior to construction activity, the Authority must work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify Project locations, Project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., “red flag” days), level of suppression equipment required on site, training requirements, and points of contact.

Rationale for Finding: As described in detail in Section 3.7 of the Draft EIR, construction in these zones will comply with local municipal code, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. The fire management plan will document procedures for both fire prevention and response. Implementation of **HAZ MM 3** would reduce construction and operational impacts to below the level of significance.

3.2.7 Hydrology /Water Quality

WQ-1: Would the project violate any water quality standards or waste discharge requirements?

Sites: AGH (Pg. 4-1), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MMC (Pg. 4-1069), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

At these sites, groundwater may also be encountered during excavation of deep foundations. Dewatering of an excavation would constitute a significant impact if the water is not discharged properly.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.8 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure UTL MM 1**, discussed below in Section 3.2.10.

Rationale for Finding: As described in detail in Section 3.8 of the Draft EIR, the Authority will comply with all conditions and stipulations specified in the dewatering permit at each of these sites, as applicable. Implementation of **UTL MM 1**, would reduce construction and operational impacts to below the level of significance.

WQ-9: Would the project expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?

Sites: ENC1 (Pg. 4-372), PWT (Pg. 4-1371)

ENC1 and PWT are located in areas that may be subject to mudflows. Mudflows could result in loss and impacts that are significant at these sites.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.8 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure GEO MM 1**, discussed above in Section 3.2.5.

Rationale for Finding: As described in detail in Section 3.8 of the Draft EIR, the geotechnical report will evaluate if a site is at risk for a mudflow and provide recommendations to be implemented to reduce the risk to the facility from mudflows. Implementation of **GEO MM 1** would reduce construction and operational impacts to below the level of significance.

3.2.8 Noise

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Sites: ENC1 (Pg. 4-372), LACF072 (Pg. 4-799)

Impacts from construction of these sites would expose sensitive receiver locations to excessive groundborne vibration, and impacts of the Project would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.10 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure NOI MM 1**, below.

NOI MM 1 Prior to commencement of construction at sites ENC1 and LACF072, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts to less than significant levels. Such measures may include, but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.
- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

Rationale for Finding: As described in detail in Section 3.10 of the Draft EIR, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction

vibration perceivable motion velocity to less than 0.01 peak particle velocity (ppv) over the range of 1 to 100 Hertz at the receiver sites. Implementation of **NOI MM 1** would reduce construction and operational impacts to below the level of significance.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Sites: ENC1 (Pg. 4-372), LACF072 (Pg. 4-799), PDC (Pg. 4-1256), SDW (Pg. 4-1448), SGH (Pg. 4-1487), WAD (Pg. 4-1872), WS1 (Pg. 4-1952), ZHQ (Pg. 4-2026)

Construction noise at site WS1 would exceed the City of Santa Monica noise ordinance that sets a maximum 20-dBA temporary increase above acceptable exterior ambient noise levels. If night construction is required at sites ENC1, LACF072, PDC, SDW, or SGH, construction noise would exceed the 80-dBA threshold during nighttime hours. Construction noise at these sites would be significant.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.10 of the Draft EIR and site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure NOI MM 2**, below. Measure NOI MM 2 would be required at sites ENC1, LACF072, PDC, SDW, and SGH if nighttime construction were to occur, and at Site WS1 at all times.

NOI MM 2 Prior to commencement of construction, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the Federal Transit Administration (FTA) nighttime threshold or applicable ordinance. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

Rationale for Finding: As described in detail in Section 3.10 of the Draft EIR, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise below the levels specified in the FTA nighttime threshold and Santa Monica noise ordinance at the receiver sites. Implementation of **NOI MM 2** would reduce construction and operational impacts to below the level of significance.

3.2.9 Transportation / Traffic

TRANS-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Sites: BJM (Pg. 4-110), DPK (Pg. 4-335), SDW (Pg. 4-1448), SGH (Pg. 4-1487)

Based on distance, runway length, and TOWAIR results, these Project sites require FCC registration and FAA notification. Their construction would be a significant impact on navigation that could affect air traffic patterns or pose a substantial safety risk.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.12 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure HAZ MM 2**, previously discussed above in Section 3.2.6

Rationale for Finding: As described in detail in Section 3.12 of the Draft EIR, completion of the FAA process for notice of alteration or construction and, as applicable, incorporating all FAA recommendations into the Project would prevent or minimize any substantial safety risks. Implementation of **HAZ MM 2** would reduce construction and operational impacts to below the level of significance.

TRANS-4: Would the project result in inadequate emergency access?

Sites: ASD (Pg. 4-74), LARICSHQ (Pg. 4-954), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), SGH (Pg. 4-1487), SIM (Pg. 4-1526), WS1 (Pg. 4-1952), ZHQ (Pg. 4-2026)

At these Project sites, construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These activities would have temporary significant impacts associated with impairing access on adjacent roadways, creating traffic hazards and limiting emergency access.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.12 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures TRANS MM 1 and TRANS MM 2**, below.

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during Project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Rationale for Finding: As described in detail in Section 3.12 of the Draft EIR, the contractor shall maintain a minimum of one open lane of traffic at all site access roads and prepare a traffic management plan for approval by the appropriate jurisdiction prior to any lane closures during Project construction. Implementation of **TRANS MM 1** and **TRANS MM 2** would reduce construction and operational impacts to below the level of significance.

3.2.10 Utilities / Service Systems

UTL-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Sites: AGH (Pg. 4-1), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MMC (Pg. 4-1069), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

During construction of deep foundations associated with new monopole or new tower locations, groundwater may be encountered during excavation activities at these Project sites. Perched groundwater that may be encountered could be contaminated, have high levels of turbidity, or generally not meet other requirements for discharge to the environment. Unpermitted discharges to the environment could exceed treatment requirements of the RWQCBs and would be considered a significant impact.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.13 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure UTL MM 1**, below.

UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit shall be obtained from the applicable RWQCB

prior to construction; and removal or discharge of water would be in accordance with the terms and conditions of the permit.

Rationale for Finding: As described in detail in Section 3.13 of the Draft EIR, the Authority will comply with all conditions and stipulations specified in the dewatering permit at each of these sites, as applicable. Implementation of **UTL MM 1**, would reduce construction and operational impacts to below the level of significance.

3.3 Findings Regarding Environmental Impacts Determined to Be Significant that Cannot be Mitigated to a Less Than Significant Level

3.3.1 Aesthetics

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Site: JOP (Pg 4-682)

Site JOP includes installation of a new 180-foot lattice tower mounted with whip and microwave antennas, an equipment shelter, and generator. Existing solar panels at the site would be replaced with larger panels. The new facilities would be located in an area with no existing tall structures. Given the height of Josephine Peak in relation to the surrounding national forest, the new structure would intrude upon scenic vistas in the area. Because the new lattice tower would introduce a new vertical intrusion onto the landscape, a substantial impact to scenic vistas would occur, resulting in a significant impact.

Finding: Specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

Rationale for Finding: As discussed in Final EIR Section 2.3, there is no alternative site for JOP. As discussed in Section 3.1 of the Final EIR and site summary forms in Chapter 4 of the DEIR, the only potential measure to mitigate adverse effects on scenic vistas would be painting the towers to blend with their visual settings. However, this measure is infeasible because FAA guidelines (FAA Advisory Circular 70/7460-1L) require certain paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain significant if they were painted to blend with the site's visual setting. As such, no feasible mitigation measures exist to reduce the impacts to less than significant levels. Therefore, impacts are significant and unavoidable at site JOP.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Site: JOP (Pg 4-682)

Site JOP is located in the Angeles National Forest and the existing scenic attractiveness is designated B, which is considered typical. The new tower would contrast and be incompatible with the visual character of the landscape, which is primarily forested. The result would be a degradation of the visual character surrounding the site resulting in a significant impact.

Finding: Specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

Rationale for Finding: As discussed in Final EIR Section 2.3, there is no alternative site for JOP. As discussed in Section 3.1 of the Final EIR and site summary forms in Chapter 4 of the DEIR, the only potential measure to mitigate adverse effects on scenic vistas would be painting the towers to blend with their visual settings. However, this measure is infeasible because FAA guidelines (FAA Advisory Circular 70/7460-1L) require certain paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain significant if they were painted to blend with the site's visual setting. As such, no feasible mitigation measures exist to reduce the impacts to less than significant levels. Therefore, impacts are significant and unavoidable at site JOP.

3.3.2 Cultural Resources

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in PRC §15064.5?

Site: LPC (Pg. 4-1029)

Site LPC has two historical resources located within the direct and indirect Areas of Potential Effect (APEs). The first of these two resources is P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. The second of these two resources is U.S. Forest Service (USFS) Resource No. 05015500237. This resource consists of two of three separate loci of the Los Pinetos Nike Missile Site, which was constructed in 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures) and the radar control facility; the third locus (the launch control facility) is situated just outside the southeast boundary of the indirect APE. The direct APE is completely encompassed by one of the Nike missile loci, and the remaining two are approximately 1,650 to 2,900 feet to the east. The

complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the NRHP. Based on the Project activities, direct and indirect (visual) impacts from construction and operation of the 70-foot monopole and the associated infrastructure features would be significant.

Finding: Changes or alterations have been incorporated into the Project that substantially lessen the significant environmental effect, as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 2, CUL MM 3, and CUL MM 5**, below. Although **Mitigation Measures CUL MM 2, CUL MM 3, and CUL MM 5** (below) would minimize Project impacts, specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

CUL MM 2: Archaeological Monitoring – Historic-Age Resources

At proposed Project sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in Draft EIR section 3.4 or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section.

The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

CUL MM 3: Unexpected Discovery of Archaeological Materials

In the event that previously unidentified prehistoric or historic-age archaeological resources are uncovered, the following actions shall be taken:

- 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. The qualified archaeological monitor mark the immediate area with highly visible flagging and immediately notify the Project Archaeologist.

- 2) The Project Archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms, and no further effort shall be required.
- 3) If the resource cannot be avoided and may be subject to further impact, the Project Archaeologist shall evaluate the resource and determine whether it is (1) eligible for inclusion in the NRHP and is thus a historic property for the purposes of the NHPA and NEPA; (2) eligible for the CRHR and thus a historical resource for the purposes of CEQA; (3) a “unique” archaeological resource as defined by CEQA; (4) a Tribal resource as defined by AB 52. If the resource is determined not to be significant under any of these four categories, work may commence in the area following collection (as appropriate) and recording, including mapping and photography, of the archaeological materials or features.
- 4) If the resource meets the criteria for any or all of the categories described in CUL MM 3, work shall remain halted, and the Project Archaeologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse changes occur. Preservation in place (i.e., avoidance) is the preferred method of ensuring no substantial adverse impacts occur on historic properties/historical resources and shall be required unless other equally effective methods are agreed upon among the Project Archaeologist, the Authority, and any other stakeholders.

If the archaeological material appears to represent a site – defined as three or more artifacts and/or features in an intact deposit – an archaeological test program (Phase II) may be necessary. Associated mitigation measures include, but are not limited to, collection of the archaeological materials, recordation (e.g., DPR Primary Record and Site Forms), and analysis of any significant cultural materials in accordance with a Data Recovery Plan, and curation of artifacts at an approved curation facility. A curation agreement for this Project is already in place with the University of California, Los Angeles, Archaeological Collections Facility at the Fowler Museum. At the completion of the appropriate mitigation measures, a professional-level technical report shall be filed with the appropriate California Historical Resources Information System (CHRIS) Information Center (IC).

- 5) Work at the Project location may commence upon completion of the appropriate mitigation treatment(s).

CUL MM 5: Architectural Resources Protection and Camouflage

Attachment of Equipment to Historic Buildings and Structures

For historic buildings or structures where communications-related equipment will be attached, the following preservation practices shall be employed, as applicable, to ensure that impacts are less than significant:

- 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an area on the side of the building where it will be hidden by an existing architectural feature.
- 2) When wireless nodes antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, non-penetrating mounts shall be used.
- 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment.
- 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable.
- 5) Any supports or brackets for new equipment shall be color-matched to the existing materials.
- 6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.
- 7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.

- 8) Rust-resistant mounts to prevent staining of the building materials shall be used.
- 9) Reversible mounting techniques shall be used to avoid damage to building materials.
- 10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.
- 11) New interior wiring shall utilize space in existing chases, closets, or shafts.
- 12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.
- 13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.

Architectural Camouflage

All new towers and monopoles, or an increase in the height of existing towers and monopoles that would cause adverse visual impacts on historical resources that are adjacent to or within the viewshed, shall be camouflaged. All camouflage implemented for the Project shall be sympathetic to the existing landscape (<http://www.generalcode.com/codification/sample-legislation/cell-towers>) and/or in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_06-07-11.pdf).

Tower disguises may include, but are not limited to, painting and various types of concealments, including clock/water towers, flag/light poles, silos, trees, and unique site-specific designs. Such measures must be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above).

Rationale for Finding: As discussed in Section 3.4 of the Draft EIR, site summary forms in Chapter 4 and Appendix B-4 of the Draft EIR, the mitigation measures described above would require the presence of archaeological monitors during all ground-disturbing activities at Site LPC. In

addition, camouflage of the monopole would be required because the monopole would be out of character with the Cold War-era Los Pinetos Nike Missile Site landscape. With implementation of **CUL MM 2**, **CUL MM 3**, and **CUL MM 5**, impacts would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this site, even with implementation of the required mitigation discussed above, impacts would not be reduced to less than significant levels. There are no other feasible mitigation measures that could reduce impacts at Site LPC below the level of significance. Therefore, impacts at Site LPC would be significant and unavoidable.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to PRC § 15064.5?

Site: LPC (Pg. 4-1029)

As discussed above under CUL-1 above, USFS Resource No. 05015500237 is within both the direct and indirect APEs. This resource consists of two of three separate loci of the Los Pinetos Nike Missile Site, which was constructed in 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures) and the radar control facility; the third locus (the launch control facility) is situated just outside the southeast boundary of the indirect APE. The direct APE is completely encompassed by one of the Nike missile loci, and the remaining two are approximately 1,650 to 2,900 feet to the east. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the NRHP. Based on the Project activities, direct and indirect (visual) impacts from construction and operation of the 70-foot monopole and the associated infrastructure features would be significant.

Finding: Changes or alterations have been incorporated into the Project that substantially lessen the significant environmental effect as identified in Draft EIR Section 3.4 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures CUL MM 2** and **CUL MM 3**, previously discussed above under CUL-1. Although these mitigation measures would minimize Project impacts, specific economic, legal, social, technological, or other considerations make it infeasible to reduce this impact to a less than significant level.

Rationale for Findings: As discussed in Section 3.4, site summary forms in Chapter 4, and Appendix B-4 of the Draft EIR, the presence of archaeological monitors would be required during all ground-disturbing activities at Site LPC. With implementation of **CUL MM 2** and **CUL MM 3**, impacts would be minimized; however, based on the historical significance of this site and the extent and location of the resources, even with implementation of the required mitigation discussed above, impacts would not be reduced to less than significant levels. There are no other feasible mitigation measures that could reduce impacts at Site LPC below the level

of significance. Therefore, impacts at Site LPC on historic archeological resources would be significant and unavoidable.

3.4 Findings Regarding Cumulatively Considerable Impacts

3.4.1 Findings Regarding Cumulatively Considerable Impacts That Would Be Mitigated to a Less Than Significant Level

3.4.1.1 Air Quality

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WS1 (Pg. 4-1952), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.2 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure AQ MM 1**.

Rationale for Finding: The construction contractor will be required to forecast Project emissions based on actual equipment that would be operating. Data would be provided and verified by the Authority, and no exceedance of NOx standards will be permitted. With implementation of **Mitigation Measure AQ MM 1**, NOx emission would be reduced below the level of significance and would not result in a cumulatively considerable significant impact that would conflict or obstruct implementation of the AQMP.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915),

LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WS1 (Pg. 4-1952), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.2 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measure AQ MM 1**.

Rationale for Finding: With implementation of Mitigation Measure AQ MM 1, NOx emission would be reduced below the level of significance and would not result in cumulatively considerable net increase in any criteria pollutants.

3.4.1.2 Biological Resources

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

Potential project-related impacts to special status wildlife and plant species were evaluated at the proposed Project sites evaluated in the Draft EIR. Continued habitat loss, mortality of wildlife, or disturbance to wildlife as a result of any project included on the cumulative projects list (see Draft EIR Table 2.7-1) would constitute a cumulatively considerable significant impact.

Finding: Changes or alterations have been incorporated into the Project that avoid or substantially lessen the significant environmental effect as identified in Draft EIR Section 3.3 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures BIO MM 1 – BIO MM 24**.

Rationale for Finding: As described in detail in Section 3.3 of the Draft EIR, the Project would avoid substantial adverse effects on species and habitat through worker education, species and habitat identification, avoidance, and monitoring. Implementation of Mitigation Measures BIO MM 1 through BIO MM 24 would reduce cumulatively considerable construction and operational impacts to below the level of significance.

3.4.1.3 Cultural Resources

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), ASD (Pg. 4-74), CPK (Pg. 4-296), GRM (Pg. 4-566), H-17A (Pg. 4-604), LARICSHQ (Pg. 4-954), LEPS (Pg. 4-989), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PDC (Pg. 4-1256), PHN (Pg. 4-1294), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SIM (Pg. 4-1526), SPN (Pg. 4-1563), TOP (Pg. 4-1722), WS1 (Pg. 4-1952), ZHQ (Pg. 4-2026)

Finding: These Project sites are within geologic units with moderate to high paleontological potential, either at the surface or at depth. Each site, considered in combination with the specified projects listed in Draft EIR Table 2.7-1, would result in significant cumulative impacts and, given the location of each site within geologic units of moderate to high paleontological potential, the incremental contribution from each identified site would be cumulatively considerable.

Rationale for Finding: Paleontological monitoring implemented under mitigation measures **CUL MM 6** and **CUL MM 7** would ensure the protection of any unexpectedly encountered paleontological resources and to reduce the potential for cumulatively considerable paleontological impacts to less than significant levels.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074.

Site: ENC1 (Pg. 4-372), PWT (Pg. 4-1371), TOP (Pg. 4-1722), ZHQ (Pg. 4-2026)

Finding: Proposed Project site PWT has the potential for containing Tribal resources (see Draft EIR **Error! Reference source not found.** and **Error! Reference source not found.**), and these types of resources have been noted within the 0.5-mile radius of this Project site. If Tribal cultural resources lay within the direct APE (project ground-disturbing areas) of this Project site, construction impacts would be significant. However, implementation of mitigation measures **CUL MM 1**, **CUL MM 3**, and **CUL MM 4** at site PWT would ensure that any unexpectedly encountered Tribal resources are protected and to reduce the potential for cumulatively considerable impacts to less than significant levels.

Rationale for Finding: Implementation of mitigation measures **CUL MM 1**, **CUL MM 3**, and **CUL MM 4** at site PWT would ensure that any unexpectedly encountered Tribal resources are protected and to reduce the potential for cumulatively considerable impacts on tribal resources to less than significant levels.

3.4.2 Findings Regarding Cumulatively Considerable Impacts That Cannot Be Mitigated to a Less Than Significant Level

3.4.2.1 Biological Resources

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sites: AGH (Pg. 4-1), AJT (Pg. 4-38), BJM (Pg. 4-110), BUR1 (Pg. 4-185), CPK (Pg. 4-296), DPK (Pg. 4-335), ENC1 (Pg. 4-372), FRP (Pg. 4-452), FTP (Pg. 4-490), GMT (Pg. 4-528), GRM (Pg. 4-566), H-17A (Pg. 4-604), JOP (Pg. 4-682), JPK (Pg. 4-721), LACF072 (Pg. 4-799), LACFCP11 (Pg. 4-915), LEPS (Pg. 4-989), LPC (Pg. 4-1029), MMC (Pg. 4-1069), MML (Pg. 4-1104), MTL2 (Pg. 4-1142), OAT (Pg. 4-1181), PASPD01 (Pg. 4-1219), PHN (Pg. 4-1294), PMT (Pg. 4-1332), PWT (Pg. 4-1371), RIH (Pg. 4-1410), SDW (Pg. 4-1448), SGH (Pg. 4-1487), SPN (Pg. 4-1563), SUN (Pg. 4-1603), TOP (Pg. 4-1722), TPK (Pg. 4-1762), TWR (Pg. 4-1799), VPK (Pg. 4-1836), WAD (Pg. 4-1872), WMP (Pg. 4-1913), WTR (Pg. 4-1990), ZHQ (Pg. 4-2026)

The Migratory Bird Treaty Act of 1918 (MBTA) protects species of native migratory birds listed under the MBTA. The American Bird Conservancy reports an estimated 6.8 million birds annually are killed by collision with communication towers in the United States and Canada. The Department of Interior Office of the Secretary (2014) reports that impacts from non-ionizing electromagnetic radiation emitted by communication towers could be significant for birds, and that cell tower radiation could be a threat to nearby nesting birds. To address these concerns, the USFWS Office of Migratory Birds has issued voluntary guidelines for communications tower placement, construction, and operation. Guidelines emphasize collocation wherever possible, height limitations of 199 feet above ground level, designs that avoid guy wires, unlighted structures if FAA regulations permit, and avoidance of migratory pathways.

Finding: Changes or alterations have been incorporated into the Project that substantially lessen the significant environmental effect as identified in Draft EIR Section 3.3 and in the site summary forms in Chapter 4 of the Draft EIR, which are incorporated by reference herein. These changes are set forth in **Mitigation Measures BIO-6** and **BIO MM 18**. Although these mitigation measures would minimize Project impacts, specific economic, legal, social, technological, or other considerations make it infeasible to reduce this cumulatively considerable impact to a less than significant level.

Rationale for Finding: The addition of LMR structures, as well as the vast array of existing towers and high rise buildings across Los Angeles County contributes to the cumulative loss of migratory birds. This loss would be less substantive for tower structures that implement the USFWS voluntary guidelines for communications towers. This incremental impact of bird mortality due to Project implementation is “cumulatively considerable”. Though the applicable standards for the construction of communication towers are being fully met (with the exception of Site DPK 200 feet tall vs. 199 feet tall), no additional mitigation measures are available to reduce the Project’s contribution to cumulative impacts on migratory birds to less than significant.

3.5 Findings Regarding Responses to Comments on the Draft EIR and Revisions to the Final EIR

The LMR Final EIR does not identify any new significant environmental impacts that were not already identified by the Draft EIR. No new mitigation measures were imposed on the Project that could result in a new significant environmental impact. The Final EIR also does not identify any increases in the severity of any environmental impacts discussed in the Draft EIR. In addition, public comment on the Draft EIR did not identify any new alternatives to the Project that are considerably different from those evaluated in the EIR and that would clearly lessen the significant environmental impacts of the Project.

Responses to comments made on the LMR Draft EIR and revisions made in the LMR Final EIR merely clarify and amplify the analyses presented in the Draft EIR document and do not amount to significant new information that changes the EIR in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect that the Authority has declined to implement. Therefore, the Authority finds that recirculation of the LMR EIR is not required pursuant to CEQA Guidelines §15088.5(b).

4.0 Findings on Alternatives to the Project

4.1 Alternatives Considered and Eliminated from Further Consideration

4.1.1 Collocation

This alternative would consist of limiting installation of LMR antennas to existing structures, including roof tops, monopoles, and towers, i.e., “collocation.”

Finding: Specific economic, legal, social, technological, or other considerations make this alternative infeasible, and the Authority rejects this alternative because it would not meet the objectives of the Project.

Rationale for Finding: Where feasible to support system performance and reduce the number of sites, the Authority included site design documentation and plans to support collocation and/or utilization of existing telecom tower/sites; however, installing the LMR antennas on existing structures is not possible at each potential LMR site (Draft EIR Section 2.6.1). LMR sites were identified at locations that would provide the maximum countywide coverage using the minimum number of sites. Existing structures for mounting LMR antennas are not present at all locations that are required to achieve countywide coverage. At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas. Therefore, construction of new lattice towers and monopoles would be required to complete the LMR system. Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further.

4.1.2 Use of Cell on Wheels

Cell on Wheels (COWs) are mobile, portable cell towers with self-contained equipment and generators, typically used to provide expanded cellular network coverage and/or capacity for temporary, short-term demands. COWs are not tall enough to provide the required line of sight at most LMR sites, especially those where new lattice towers are proposed, nor do they provide the type of permanent emergency communications capability envisioned for the proposed Project.

Finding: Specific economic, legal, social, technological, or other considerations make this alternative infeasible. On this basis, the Authority has eliminated this alternative from further consideration because it would not meet the objectives of the Project.

Rationale for Finding: Although they are comparable in height to many of the monopoles for various LMR sites, most of which would be 70 feet tall, COWs are intended for temporary use and not large enough to support all the antennas required at LMR sites (Draft EIR Section 2.6.2). Therefore, use of COWs, either for all sites or at select sites, would not meet the Project objectives and, therefore, this alternative was not considered further.

4.1.3 Use of Satellites

LMR communication could be conducted by using a satellite-based system.

Finding: Specific economic, legal, social, technological, or other considerations make this alternative infeasible. On this basis, the Authority has eliminated this alternative from further consideration because it would not meet the objectives of the Project.

Rationale for Finding: Satellite systems experience a significant lag time between sender and receiver that does not allow the quick communication required during an emergency response (Draft EIR Section 2.6.3). Therefore, use of a satellite system would not meet Project objectives and was not considered further.

4.1.4 Alternative Systems

As the governing board for the LA-RICS telecommunications system, the Authority reviewed various telecommunications options and worked with industry experts to modernize their systems and ease transition from the existing network to a hybrid of digital and analog networks to provide a mobile data system.

Finding: Specific economic, legal, social, technological, or other considerations make this alternative infeasible. On this basis, the Authority has eliminated this alternative from further consideration because it would not meet the objectives of the Project.

Rationale for Finding: In November 2011, requests for proposals were developed to support the hybrid system. In January 2012, proposals were received and a vendor was chosen. Alternative systems to the hybrid system were not identified (Draft EIR Section 2.6.4). Therefore, use of a hybrid communication system would not meet Project objectives and was not considered further.

4.2 Alternatives Analyzed in the Draft EIR

As discussed in Section 2.1.2 of the Draft EIR, the Authority considered more sites than would ultimately be constructed. By considering more sites than would ultimately be constructed, the Authority effectively considered numerous alternative locations for the Project. Specific groups of sites considered alternates to each other were identified. Within each group, only one site would be constructed.

Sites BUR, BUR1, BUR2, and BUR3

These sites are alternate locations within the same telecommunications site complex within the Angeles National Forest. As analyzed in the Draft EIR and summarized in Table ES-1 of the Draft EIR, environmental impacts at each of these sites would be similar; and no one site is environmentally superior to the others. At sites BUR, BUR2 and BUR3 the FAA has imposed limitations on tower heights. Of these sites the Authority has selected BUR1.

Finding: Specific economic, legal, social, technological, or other considerations make Sites BUR, BUR2, and BUR3 infeasible.

Rationale for Finding: BUR2 and BUR3 are proximate to the FAA beacon at the site. When originally submitting a tower notification request, the FAA determined that no tower that went above the height of the beacon would be permitted. BUR1's elevation is substantially lower (almost 200 feet) than the elevation of the beacon and thus allows the construction of a larger antenna support structure. Additionally, BUR1 is located next to an existing lattice tower. Therefore, due to the limitations imposed by the FAA at the other sites, the Authority has determined it is infeasible to construct at Sites BUR, BUR2 and BUR3, and has selected Site BUR1 as the Project Site.

Sites ENT, LACFCP08, and TOP

These sites are located in the Santa Monica Mountains. Although they cover similar geographic areas, these sites do not provide comparable communication area coverage. Specifically, if the TOP site is not constructed, the Authority would need to consider building both ENT and LACFCP08 to achieve similar communication area coverage. Of these three sites, the Authority has selected Site TOP.

Finding: Specific economic, legal, social, technological, or other considerations make Sites ENT and LACFCP08 infeasible.

Rationale for Finding: Of these three sites, Site LACFCP08 is the only site that would result in significant and unavoidable impacts. Specifically, at Site LACFCP08, significant and unavoidable impacts would occur to cultural resources. Selection of either Site ENT or Site TOP would avoid these significant and unavoidable impacts and would not result in any other significant and unavoidable impacts. Additionally, Site LACFCP08 would not achieve the Project objectives to any greater extent than Sites ENT and TOP. Therefore, Site LACFCP08 has been eliminated from consideration because it is the least environmentally preferable among the three alternative sites.

As analyzed in the Draft EIR, impacts at Sites ENT and TOP would be similar. However, while no impacts would occur at either site that could not be reduced to less than significant with mitigation, Site TOP would require more mitigation measures for biological and cultural resources than Site ENT to reduce impacts to less than significant. Therefore, Site ENT is considered environmentally superior to Site TOP by a small margin. However, Site ENT would not provide communication coverage to an area as large (both geographically and by population) as Site TOP, and would provide coverage to an area that generally is served by other Project sites. Additionally, selection of Site ENT instead of Site TOP would leave portions of the Malibu area without LMR coverage. Therefore, Site ENT would not meet the Project objective of providing day-to-day voice and narrowband data radio communications for first and second emergency responders in the Los Angeles region to the same extent as Site TOP. Additionally, within that geographic area, there would be

- no interoperability among member agencies and mutual aid providers

- no support of communications with federal state and local agencies in emergencies
- no improvement of emergency communications
- no additional capacity created or replacement of aging infrastructure that meets current public safety requirements
- no ability to increase separation of antennas on support structures to reduce interference
- no provision of increased frequency flexibility to increase system coverage or capacity
- no ability to transition from existing T-Band (where it exists) to 700 MHz systems.

The sites proposed in the Santa Monica Mountains National Recreation Area and Topanga State Park provide coverage to serve population centers, transportation corridors, and areas of highest wildland fire, among other concerns. Physical, land use, and other constraints to development within these areas of concern within the Santa Monica Mountains National Recreation Area and Topanga State Park substantially limit suitable sites that serve these areas, hence eliminating the availability of alternatives in many locales.

Sites FRP and TMT

Sites FRP and TMT are both within Angeles National Forest. Site FRP is south of Highway 2, and Site TMT is north of Highway 2, but the settings are relatively similar. As analyzed in the Draft EIR, there is no distinction between the two sites in terms of anticipated environmental impacts. Neither is environmentally superior to the other. Site FRP has been selected as the Project site from this group.

Finding: Specific economic, legal, social, technological, or other considerations make Site TMT infeasible.

Rationale for Finding: The FRP site would provide superior communication area coverage in comparison to TMT. Additionally, the site contains larger existing structures for mounting Project components than TMT. Further, selection of Site FRP would avoid the environmental impacts and required mitigation at Site TMT. Therefore, from a Project implementation standpoint, and because FRP fulfills Project objective more effectively, the Authority has selected site FRP as the Project site.

Sites LACFCP09 and LPC

Sites LACFCP09 and LPC are both within Angeles National Forest and about 0.25 mile apart from one another. The environmental impacts of the two sites are similar for most resources. Of these two sites, the Authority has selected Site LPC.

Finding: Specific economic, legal, social, technological, or other considerations make Sites LACFCP09 infeasible.

Rationale for Finding: Significant and unavoidable impacts to cultural resources would occur at both sites. While environmental impacts at the two sites would be similar, impacts to biological resources and

geology and soils would be slightly greater at Site LPC. Therefore, although impacts would be similar between the two sites, Site LACFCP09 is considered the environmentally superior site. However, Site LACFCP09 is not within a USFS-designated communication site. By contrast, Site LPC is within a USFS-designated communication site. To enhance compatibility with the Forest Land Management Plan governing land use on the Angeles National Forest, the USFS has encouraged the Authority to select the site that is within an existing designated communications site. Selection of site LPC would maintain project consistency with the Forest Management Plan, thereby ultimately reducing impacts. Therefore, the Authority has selected Site LPC for its consistency with the Forest Management Plan.

Sites H-69B and SPN

Site H-69B is on an undeveloped ridgeline. Implementation of the Project at Site H-69B would result in significant and unavoidable impacts to aesthetics (AES-1, AES-3) and cultural resources (CUL-1, CUL-2, CUL-4, CUL5) as described in DEIR Sections 3.1 and 3.4, respectively. Additionally Site H69-B would result in significant impacts to Air Quality, Biological Resources, Cultural Resources and Geology/Soils which require implementation of mitigation measures to reduce these impacts to below the level of significance. SPN is an existing communications site with at least five separate installations and towers on the site. Site SPN would also result in significant impacts to Air Quality, Biological Resources, Cultural Resources and Geology/Soils, also requiring implementation of mitigation measures to reduce these impact to below the level of significance; however, Site SPN would not result in any significant unavoidable impacts. Of these two sites, the Authority has selected Site SPN.

Finding: Specific economic, legal, social, technological, or other considerations make Sites H-69B infeasible.

Rationale for Finding: Significant and unavoidable impacts would occur at site H-69B to aesthetics and cultural resources. Selection of Site SPN would avoid these significant and unavoidable impacts and would not result in any other significant and unavoidable impacts; therefore, Site SPN is the environmentally superior alternative. Site SPN has been selected by the Authority as the Project site from this group.

Sites JPK and JPK2

These sites are alternate locations within the same telecommunications site complex in the Angeles National Forest. As summarized in Table ES-1 of the Draft EIR, environmental impacts at each of these sites would be similar. Neither site is environmentally superior to the other. Site JPK is closer to the existing LA County Communications facility and is located closer to power than JPK-2.

Finding: Specific economic, legal, social, technological, or other considerations make Site JPK2 infeasible.

Rationale for Finding: The Authority has selected Site JPK, because Site JPK is closer to the existing LA County Communications facility and is located closer to power than JPK-2. Further, selection of Site JPK

would avoid the slightly greater biological resource impacts and required mitigation associated with construction of Site JPK2. Therefore, the Authority has selected site JPK as the Project site.

Sites SUN and SUN2

These sites are alternate locations within the same telecommunications complex in the Angeles National Forest. Site SUN is closest to the existing facility. As summarized in Table ES-1 of the Draft EIR, environmental impacts at each of these sites would be similar; and neither site is environmentally superior to the other. Site SUN has been selected as the Project site from this group.

Finding: Specific economic, legal, social, technological, or other considerations make Site SUN2 infeasible.

Rationale for Finding: Although these locations are very close to each other, the SUN site is the closest to the existing facility and would allow the new site to mimic the existing coverage from this location as closely as possible. In addition, selection of Site SUN would avoid the environmental impacts and required mitigation at Site SUN2. Therefore, from a Project implementation standpoint, and because Site SUN fulfills Project objective more effectively, the Authority has selected site SUN as the Project site.

No Project Alternative:

Under the No Project Alternative, none of the LMR wireless voice and narrowband data communications system sites evaluated in the Draft EIR would be constructed.

Finding: Specific economic, legal, social, technological, or other considerations make this alternative infeasible. On this basis, the Authority has eliminated this alternative from further consideration because it would not meet the objectives of the Project.

Rationale for Finding: Without the proposed Project, public safety agencies and emergency responders would continue to utilize their current radio systems, which increasingly are inadequate and/or antiquated and have exceeded their technologically useful life. In addition, most of the region's public safety telecommunications infrastructure (equipment shelters and communications towers) do not meet the technical or operational needs of the agencies that utilize them and do not provide the necessary coverage that all users need. Therefore, the No Project Alternative would not meet any of the Project objectives.

4.3 Alternatives and Mitigation Measures Identified in Public Comments

No feasible alternatives that were not already considered in the EIR were identified in public comments to the Draft EIR. Several comments requested that alternate sites be considered, but no specific sites were identified for consideration by the Authority.

The City of Agoura Hills requested that alternatives to the construction of a new 70-foot monopole at Site AGH be considered. These alternatives included collocation on an existing structure at the site and installation of a shorter monopole. The Authority has determined that the existing towers at Site AGH do not meet current building codes. Therefore, collocation on existing towers at Site AGH is not feasible under existing conditions and would require retrofitting to ensure the existing towers meet current building codes, which would add extra expense and may not ultimately be possible. Even if upgrade of the tower were feasible, collocation on existing towers at Site AGH would require the Authority to upgrade another entity's infrastructure without compensation and would put the Authority in a position of a lessee on that tower, which would very likely increase the cost of the site to the Authority and by extension, the tax payers. Additionally, it would not be technically feasible to collocate equipment on existing towers at Site AGH because the lower height of the existing towers would limit the amount of equipment the Authority could place on the towers and lower the coverage performance, which would result in a decreased ability to meet the project objectives in this geographic area. Installation of a new monopole shorter than 70 feet would also be infeasible for the same reasons (i.e., the lower height would limit the amount of equipment the Authority could place on the monopole and lower the coverage performance).

The Catalina Island Conservancy requested that the Authority consider whether the existing towers at sites BJM, DPK, and TWR could be removed and replaced by larger towers than proposed (i.e., larger than the 180 foot towers proposed for sites BJM and TWR and the 200 foot tower proposed for Site DPK). The Authority has determined that the addition of existing antennas onto a new larger tower at each of the sites would require a substantially taller and larger tower to accommodate the minimum 25 antennas to be added to each site. The larger and taller towers would create a greater visual intrusion than the proposed addition of a second tower at each site, where from many vantage points one tower would block the other from view. The Authority also determined that the installation of a much larger tower would be seen from a greater distance at each of the three sites. For these reasons, the Authority has determined that placement of equipment on a larger tower would not reduce or avoid the visual impacts of the proposed project at these sites.

The Catalina Island Conservancy also requested that the Authority consider whether a new tower is required at each of the three proposed Project sites on Santa Catalina Island. The Authority determined that it would not be feasible to locate all the existing and proposed equipment on the existing towers and that new towers would be required for each of the three sites to accommodate the LMR equipment.

No new mitigation measures were identified in the public comments. The Catalina Island Conservancy did identify enhancements to existing mitigation measures and where appropriate, the Authority accommodated the Conservancy's comments. These enhanced measures included additional coordination between the Authority and the Conservancy during the permitting process, and the inclusion of sites BJM, DPK, and TWR among those sites where archaeological monitors would be

present during ground disturbing activity. These revisions resulted in no changes to the impact significant conclusions made in the Draft EIR.

5.0 Custodian of Records

The documents and other materials that constitute the record of proceedings on which the Project findings are based are located at the LA-RICS Headquarters, 2525 Corporate Place, Suite 100, Monterey Park, California 91754. The custodian for these documents is the LA-RICS Authority. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and CEQA Guidelines § 15091(e).

6.0 Statement of Overriding Considerations

CEQA requires a public agency to balance the benefits of a Project against its unavoidable, adverse environmental impacts in determining whether to approve the project.

Section 15093 of the State CEQA Guidelines provides the following:

- (a) *CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”*
- (b) *When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the Final Environmental Impact Report (Final EIR) but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
- (c) *If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

6.1 Project Significant Impacts

Of the 44 sites analyzed in the Draft EIR and identified for construction (Table 1-1) as part of the LMR system, Sites JOP and LPC are the only sites with significant and unavoidable impacts on a project level. These impacts would occur to aesthetics and cultural resources. Cumulatively considerable and unavoidable impacts would occur at all project sites to biological resources.

6.1.1 Aesthetics

Site JOP includes installation of a new 180-foot lattice tower mounted with whip and microwave antennas, an equipment shelter, and generator. Existing solar panels at the site would be replaced with larger panels. The new facilities would be located in an area with no existing tall structures. Given the height of Josephine Peak in relation to the surrounding national forest, the new structure would intrude upon scenic vistas in the area. Because the new lattice tower would introduce a new vertical intrusion onto the landscape, a substantial impact to scenic vistas would occur, resulting in a significant impact.

Site JOP is located in the Angeles National Forest and the existing scenic attractiveness is designated B, which is considered typical. The new tower would contrast and be incompatible with the visual

character of the landscape, which is primarily forested. The result would be a degradation of the visual character surrounding the site resulting in a significant impact.

No feasible mitigation measures exist to reduce these impacts to less than significant levels at Site JOP. Therefore, impacts to scenic vistas and visual character would be significant and unavoidable.

6.1.2 Biological Resources

The addition of LMR structures, as well as the vast array of existing towers and high rise buildings across Los Angeles County contributes to the cumulative loss of migratory birds protected by the MBTA. This loss would be less substantive for tower structures that implement the USFWS voluntary guidelines for communications towers. These applicable standards for the construction of communication towers would be met for all project sites (with the exception of not exceeding the height limitations of 199 feet above ground level at Site DPK which would be 200 feet tall). Although changes or alterations set forth in **Mitigation Measures BIO-6** and **BIO MM 18** have been incorporated into the Project that substantially lessen the significant environmental effect, the incremental impact of bird mortality due to Project implementation would still be cumulatively considerable and significant. No additional feasible mitigation measures are available to reduce the Project's contribution to cumulative impacts on migratory birds to less than significant.

6.1.3 Cultural Resources

Site LPC includes installation of a 70-foot monopole with a 15-foot lightning rod, construction of a new equipment shelter, and installation of a backup generator and fuel tank on a concrete pad. Two historical resources are located within the direct and indirect APEs of Site LPC. The two resources are P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. In addition, USFS Resource No. 05015500237 is within both the direct and indirect APEs. Impacts from construction of the monopole and associated infrastructure features at this Project site would directly and indirectly (visually) impact the existing Cold War-era resources associated with the Los Pinetos Nike Missile Site, which is eligible for inclusion in the NRHP. The Project site is completely encompassed by one of three discontinuous areas associated with the Nike site (westernmost locus), and installation of the monopole would both directly and visually impact the Nike landscape. With implementation of **CUL MM 2**, **CUL MM 3**, and **CUL MM 5**, impacts would be minimized; however, based on the historical significance of this site and the extent and location of the resources, even with implementation of the required mitigation discussed above, impacts (CUL-1 and CUL-2) would not be reduced to below significant levels. Therefore, impacts of construction and operation at Site LPC on historical and historical archeological resources would be significant and unavoidable.

6.2 Overriding Considerations

The Project offers numerous benefits that outweigh the unavoidable adverse environmental effects of the Project. The LA-RICS Board recognizes that significant and unavoidable impacts will result from implementation of the Project, as discussed above. Having (1) adopted all feasible mitigation measures, (2) recognized all significant, unavoidable impacts, and (3) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the LA-RICS Board finds that there are specific overriding economic, legal, social, technological, or other benefits of the Project that outweigh those impacts and provide sufficient reasons for approving the Project. These overriding considerations justify adoption of the Project and certification of the Final EIR. Each of the benefits set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact. These benefits are as follows:

The new system will enhance safety and emergency response for 10 million Los Angeles County residents and the over 40 million Los Angeles County tourists. The LMR system will provide emergency responders with an improved communications system that will enable efficient and coordinated response to incidents and emergencies that is currently not possible in Los Angeles County. The improved communications could reduce response times and ultimately save lives. The LMR system will support a rapid, safe, and effective response during daily operations. The new system will facilitate effective radio communication to prevent and respond to crimes, keeping firefighters safe as they fight blazes, facilitating life-saving exchanges of information between emergency medical service professionals and hospitals, and allowing third responders such as public works and utility providers the opportunity to coordinate responses to disasters and special events. Additionally, the Los Angeles region is disaster prone and is designated as a high-threat area by the Department of Homeland Security (DHS). The Los Angeles area is subject to 13 of 16 disaster types. The LMR system will support faster, better-coordinated, large-scale multi-agency response to emergencies such as terrorist attacks, earthquakes, civil disturbance, wildfire or other disasters, improving overall system capacity and coverage for first and second responders region-wide.

The new system will replace an outdated proprietary system with a standards-based communication system. The LA-RICS LMR system is a standards-based system that is designed to facilitate the use of standards-based radio equipment regardless of manufacturer. Legacy systems are proprietary; and, as such, each proprietary system must use proprietary equipment that is specific to that model and/or version of network. Interoperability with other vendors' systems and, in many cases, different models of networks by the same manufacturer requires third party equipment to "patch" the systems together. This patch introduces a potential point of failure during times of critical communications and does not solve the problem of proprietary equipment (radios) communicating directly on a different proprietary network. The LA-RICS network will provide first and secondary responders using standards-based equipment, regardless of model or manufacturer, the ability to communicate directly with each other and remove the point of failure that is introduced with a patch. Additionally, the LA-RICS network will

provide for a **standards-based interface with other manufacturers' standards-based networks, thus preserving direct interoperability within a system-of-system environment.**

The new system will meet the FCC mandate to vacate UHF T-Band frequency spectrum at 470 to 512 MHz for members of the LA-RICS Joint Powers Authority. The LA-RICS LMR system will provide a modern, integrated wireless voice and narrowband data communications system designed and built to serve law enforcement, fire service, health service, and public works professionals throughout Los Angeles County. The system does not operate on the FCC-mandated vacated spectrum. It seamlessly operates on two bands of spectrum, 700 MHz and UHF.

The new system will replace 40 aging radio networks with one state-of-the-art network, solely dedicated to emergency responders, that increases overall capacity for and speed of communication during local emergencies, special events, and disasters. The new system will provide day-to-day communications within and among agencies and allow seamless interagency communications for responding to routine, emergency, and catastrophic events. The system is composed of four different subsystems:

- 1) Digital Trunked Voice Radio System — provides first responders with radio communications utilizing digital technology. It seamlessly operates on two bands of spectrum (700 MHz and UHF)
- 2) Analog Conventional Voice Radio System — provides first responders with radio communications utilizing conventional analog technology
- 3) Los Angeles Regional Tactical Communications System — consists of local, state, and federal interoperability channels in four different bands of spectrum in order to allow outside agencies responding to events in the County to have designated channels for communications
- 4) Narrowband Mobile Data Network — a data system that provides critical dispatch communications

DRAFT
ENVIRONMENTAL IMPACT REPORT
FOR THE
LOS ANGELES REGIONAL INTEROPERABILITY
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM



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Appendix C – Construction Best Management Practices

Executive Summary

Introduction/Background

Public safety services in Los Angeles County are provided by more than 80 public safety agencies represented by approximately 34,000 first responders and 17,000 secondary responders serving more than 10 million residents, as well as tourists and commuters. These agencies cover large tracts of the county, and their current radio systems are inadequate and/or antiquated and have exceeded their technologically useful life (i.e., equipment and programming are no longer supported by vendors). Most of the region's public safety telecommunications infrastructure (equipment shelters and communications towers) does not meet the technical or operational needs of the agencies that utilize them and do not provide the necessary coverage that all users need.

Without adequate capacity on the radio system, even on a daily basis, first responders often struggle to acquire the necessary resources to communicate. The issue is exacerbated on large incidents where a shortage of radio resources greatly impacts operations due to the need for multiple command, tactical, and mutual aid channels. For example, first responders may not be able to request additional resources to assist them in life-threatening situations, hear evacuation orders, or hear broadcasted warning messages from dispatchers. Without adequate capacity to dedicate individual radio channels to individual incidents, the likelihood of interference between units responding to separate incidents is high.

In April 2005, the Regional Interoperable Steering Committee was formed to explore the development of a single, shared communications system for all public safety agencies in the greater Los Angeles region. As a result, the County of Los Angeles (County), 82 municipalities, and 3 other public sector entities in the region drafted a Joint Powers Agreement that established the Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (Authority) to create a regional, area-wide, interoperable public safety communications network.

This Environmental Impact Report (EIR) discloses the potential environmental impacts associated with construction and operation of the of the public safety communication network through the implementation of a Land Mobile Radio (LMR) system. The LMR system is a wireless communications system for mobile and portable devices such as walkie-talkies and two-way radios. The LMR system would consist of installation of LMR antennas on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures and support equipment at up to 90 sites, located primarily in Los Angeles County. The LMR sites would contain the infrastructure and equipment necessary to provide day-to-day voice and narrowband data radio communications coverage for emergency responders throughout the County.

The objectives of the LMR Project are:

- 1) Provide day-to-day voice and narrowband data radio communications for first and secondary emergency responders in the Los Angeles region
- 2) Enable interoperability among member agencies and mutual aid providers
- 3) Support communication with regional, state, and federal agencies in the event of a natural or man-made disaster
- 4) Improve emergency communications within Los Angeles County
- 5) Add capacity, replace existing aging infrastructure with infrastructure that meets current building codes and telecommunications industry standards that better support modern technology, and provide for more technologically advanced equipment
- 6) Lessen the amount of interference resulting from multiple systems on the same tower by providing greater separation of different radio frequencies
- 7) Provide greater frequency flexibility and increase overall system coverage and capacity by providing greater separation of different radio frequencies
- 8) Allow for transition from use of the ultra-high-frequency T-Band to the 700-megahertz spectrum as mandated by the Federal Communications Commission (FCC)

Project and Alternatives

The LMR Project consists of the construction and operation of up to 90 LMR sites out of 94 sites under consideration. These 90 sites may be a combination of sites previously found statutorily exempt from CEQA (see Section 1.3.2) and sites addressed in this EIR as the proposed Project (see Section 2.1.2). By considering more sites than would ultimately be constructed, the Authority is effectively considering numerous alternative locations for the proposed Project. The ultimate selection of which sites will be constructed will be determined based on the conclusions of the Draft EIR, as well as whether some of the 94 potentially feasible sites ultimately prove infeasible due to economic, environmental, legal, social, or technological factors, including system engineering, geotechnical evaluations, and permitting process or in lease agreement discussions with the property owner.

In 2012, the California Legislature, in recognition of the urgent need of the LA-RICS, granted the Authority a limited statutory exemption from the California Environmental Quality Act (CEQA) (Public Resource Code [PRC] § 21080.25.). PRC section 21080.25 exempts the design, site acquisition, construction, operation, and maintenance of the LA-RICS LMR system from CEQA review so long as each individual project site meets the following criteria:

- The site is publicly owned and already contains an antenna support structure and/or is a police, sheriff, or fire station, or other public facility that transmits or receives public safety radio signals.
- Construction and implementation at the project site would not have a substantial adverse impact on wetlands, riparian areas, or habitat of significant value and would not harm any

species protected by the federal Endangered Species Act of 1973 (16 United States Code [U.S.C.] Section 1531 et seq.), the Native Plant Protection Act (Chapter 10, commencing with Section 1900, of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5 [commencing with Section 2050] of Division 3 of the Fish and Game Code), or the habitat of those species.

- Construction and implementation at the project site would not have a substantial adverse impact on historical resources pursuant to PRC Section 21084.1
- Operation of LMR facilities at the site would not exceed the maximum permissible exposure standards established by the FCC, as set forth in Sections 1.1307 and 1.1310 of Title 47 of the Code of Federal Regulations (CFR).
- The LMR antenna support structures at the site would comply with applicable state and federal height restrictions, and any height restrictions mandated by an applicable comprehensive land use plan adopted by an airport land use commission. Any new lattice towers shall not exceed 180 feet in height without appurtenances and attachments, and any new monopoles shall not exceed 70 feet in height without appurtenances and attachments.
- Each new central system switch is located within an existing enclosed structure at a publicly owned project site or housed at an existing private communications facility.
- None of the sites are located on a school or sacred cultural site.

On November 13, 2014, February 5, 2015, and December 17, 2015, the Authority determined, based on substantial evidence, that a number of the potential LMR sites meet all of the required criteria for exemption from CEQA and authorized project construction, implementation, and operation at these sites.

All proposed LMR sites that are not exempt from CEQA under the statutory exemption in PRC section 21080.25 are evaluated at a project level in this EIR. Construction and implementation of LMR infrastructure at these non-CEQA-exempt sites would occur only if the Authority certifies the EIR and approves construction of LMR facilities at these sites. As with the CEQA-exempt sites, certification of the EIR does not commit the Authority to construct all the sites addressed as part of the proposed Project in this EIR. The sites evaluated in this EIR are listed in Table 2.1-1.

The EIR also considers a No Project Alternative. The No Project alternative represents the anticipated conditions if construction and operation of the proposed Project were not implemented. Under the No Project Alternative, the LMR wireless voice and narrowband data communications system sites that are the subject of this EIR would not be constructed; however, the existing facilities at the communication sites identified for LMR use in this EIR would continue to be inspected, maintained, and repaired as part of ongoing activities.

Areas of Controversy

Known areas of controversy are briefly summarized below and are addressed in within Chapter 3 of this EIR.

- **Aesthetics:** Impacts to scenic resources and visual character are a concern to the public. The visual effects of the Project are addressed in Section 3.1, Aesthetics.
- **Land Use:** Compatibility with local land use planning and zoning is a concern to municipalities. Land use impacts from the Project are addressed in Section 3.9, Land Use.
- **Radiofrequency Exposures:** Potential health issues associated with radiofrequency (RF) exposures from LMR facilities is a concern to the public. The potential for radiofrequency exposures associated with the proposed Project is addressed in Section 5.3.

Impact Summary Table

Table ES-1 summarizes the CEQA significance determinations for each significance criteria for every site discussed within the EIR. Findings of no impact (also shown as NI in the table) are made in green and findings less than significant impacts (LTS) are in light green. Yellow (LTSM) indicates a finding of significant impact that was determined reduced to less than significant with application of mitigation measures. Findings of significant and unavoidable impacts (SU) are identified in red.

Proposed environmental mitigation measures for significant impacts are discussed in detail in Chapter 3 in the following Sections: 3.1.4 (Aesthetics), 3.2.4 (Air Quality), 3.3.4 (Biological Resources), 3.4.5 (Cultural Resources), 3.5.4 (Geology/Soils), 3.7.4 (Hazards and Hazardous Materials), 3.8.4 (Hydrology/Water Quality), 3.9.4 (Land Use/Planning), 3.10.4 (Noise), 3.12.4 (Transportation/Traffic), and 3.13.4 (Utilities). Table ES-2 provides a list of mitigation measures and identifies to what impacts and at what sites they apply. Implementation of the mitigation measures for LMR sites selected and approved for construction will be monitored and enforced by the Authority in accordance with CEQA Guidance Section 15097. Specific mechanisms are in place to assure all mitigation measures included in this EIR are implemented and that the provisions are enforceable. A Mitigation Monitoring and Reporting Program is being prepared and includes all mitigation measures and implementation details.

Issues to be Resolved

This Draft EIR identifies the No Project Alternative as the Environmentally Superior Alternative; however, the No Project Alternative does not meet the Project objectives. As discussed previously, more sites are proposed than would be constructed. Some groups of one or more proposed Project sites analyzed in this EIR are specifically identified as alternatives to each other where only one would be constructed. Table ES-1 shows known alternative/replacement sites. These sites are listed next to each other and grouped by a heavy line to allow easy comparison of the environmental impacts among them.



Among these sites, where an environmentally superior alternative can be determined, it is identified within each group.

Upon consideration of this EIR, as well as other relevant factors, the Authority will resolve the issue of the choice among these alternative/replacement sites.



Table ES-1: Impact Summary Table

AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																							
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5
BUR	Burnt Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
BUR1	Burnt Peak - 1	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
BUR2	Burnt Peak - 2	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
BUR3	Burnt Peak - 3	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
ENT	Entrada Tank Site	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
LACFCPO 8	Camp 8	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	SU	SU	LTSM	NI	NI
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	SU	SU	NI	NI	NI
TOP	Topanga Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	NI	LTSM	NI	LTS	LTSM	LTSM	LTSM	LTSM
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI

AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																								
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5	
FRP	Frost Peak (Upper Blue Ridge)	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI
TMT	Table Mountain	New Tower	Construction Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI
LACFCPO 9	County CP 9	New Monopole	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	NI	NI
LPC	Loop Canyon	New Monopole	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	NI	NI
H-69B	H-69B	New Tower	Construction Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	LTS	SU	SU
			Operational Impacts	SU	LTS	SU	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	SU	SU	NI	SU
SPN	Saddle Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	LTS	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI
JPK	Johnstone Peak - 1	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI



AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																							
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5
JPK2	Johnstone Peak - 2	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	LTS	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
SUN	Sunset Ridge	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	LTS	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
SUN2	Sunset Ridge-2	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	LTS	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
AGH	Agoura Hills	New Monopole	Construction Impacts	NI	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTSM	NI	NI	LTS	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	LTS	NI	NI	NI	NI	NI	NI
AJT	AeroJet	Existing Tower	Construction Impacts	NI	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTSM	LTS	NI	LTS	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	LTS	NI	NI	NI	NI	NI	NI
ASD	Auto Square Drive	New Monopole	Construction Impacts	NI	NI	NI	LTS	LTSM	LTSM	LTSM	LTS	LTS	NI	NI	LTS	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
BJM	Black Jack Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	NI	NI	NI	NI
CPK	Castro Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI



AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																							
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	LTS	LTSM	NI	NI	LTS	NI	NI	NI
DPK	Dakin Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	LTS	NI	NI	NI	NI	NI	NI
ENC1	Encinal 1 (Fire Camp 13)	New Tower	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	NI	LTSM	NI	LTSM	LTSM	NI	LTSM	LTSM
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI
FTP	Flint Peak	New Tower	Construction Impacts	NI	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
GMT	Grass Mountain	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTS	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
GRM	Green Mountain	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTSM	LTS	NI	LTSM	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
H-17A	H-17A	New Tower	Construction Impacts	NI	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTSM	LTS	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
JOP	Josephine Peak	New Tower	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTS	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	SU	LTS	SU	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI



AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																							
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5
LACF072	County FS 72	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTS	LTS	NI	LTSM	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	LTSM	NI	NI	NI	NI	NI
LACFCP1 1	County CP 11	New Monopole	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTSM	LTS	LTS	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
LARICSH Q	LA-RICS Headquarters Building	Roof Mount	Construction Impacts	NI	NI	NI	LTS	LTSM	LTSM	LTSM	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	LTSM	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
LEPS	Lower Encinal Pump Station	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTS	LTS	NI	NI	NI	NI	NI	NI	LTSM	NI
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
MMC	Mount McDill	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI
MML	Magic Mountain Link	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTS	NI	LTS	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
MTL2	Mount Lukens-2	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	LTS	LTS	NI	NI

AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																								
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5	
OAT	Oat Mountain -1	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI
PASPD01	Pasadena Police Department	New Monopole	Construction Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
PDC	Pacific Design Center	Roof Mount	Construction Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	LTS	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
PHN	Puente Hills	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	LTS	NI	NI	NI	NI	LTS	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	NI	NI	NI	NI
PMT	Pine Mountain	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	LTS	LTS	LTS	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	LTS	LTS	NI	NI
PWT	Portshead Tank	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
RIH	Rio Hondo	New Tower	Construction Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	LTS	NI	NI	NI	LTS	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	NI	NI	NI	NI



AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																								
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5	
SDW	San Dimas	New Tower	Construction Impacts	NI	NI	NI	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	LTSM	LTS	NI	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
SGH	Signal Hill	Existing Tower	Construction Impacts	NI	NI	NI	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
SIM	Simpsons' Building	Roof Mount	Construction Impacts	NI	NI	NI	LTS	LTSM	LTSM	LTSM	LTS	LTS	NI	NI	LTS	NI	NI	NI	NI	NI	NI	LTSM	NI	NI
			Operational Impacts	NI	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
TPK	Tejon Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTSM	LTS	LTSM	LTSM	NI	NI	LTSM	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI	NI
TWR	Tower Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	NI	NI	NI	NI	NI	NI
VPK	Verdugo Peak-2	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
WAD	Walker Drive	Existing Monopole	Construction Impacts	NI	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	LTSM	NI	NI	NI	NI
WMP	Whitaker Middle Peak	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTSM	LTSM	LTSM	LTS	LTS	LTSM	NI	NI	NI	LTSM	NI	LTS	LTS	NI	NI	NI	



AESTHETICS, BIOLOGICAL RESOURCES, AND CULTURAL RESOURCES																							
Site ID	Site Name	Mono pole/ Tower	Impact Type	AES-1	AES-2	AES-3	AES-4	AQ-1	AQ-2	AQ-3	AQ-4	AQ-5	BIO-1	BIO-2	BIO-3	BIO-4	BIO-5	BIO-6	CUL-1	CUL-2	CUL-3	CUL-4	CUL-5
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
WS1	100 Wilshire	Roof Mount	Construction Impacts	LTS	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	LTS	NI	NI
			Operational Impacts	LTS	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
WTR	Whittaker Ridge	New Tower	Construction Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI
			Operational Impacts	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	LTS	LTS	NI	NI	NI
ZHQ	Zuma Life Guard HQ	New Monopole	Construction Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	LTS	NI	LTS	LTS	LTS	LTS	LTS
			Operational Impacts	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI

NI = No Impact
 LTS = Less than Significant Impact
 LTSM = Significant Impact Reduced to Less than Significant with Mitigation Incorporated
 SU = Significant and Unavoidable Impact

GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
BUR	Burnt Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
BUR1	Burnt Peak - 1	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
BUR2	Burnt Peak - 2	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
BUR3	Burnt Peak - 3	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
ENT	Entrada Tank Site	New Monopole	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI
LACFCP08	Camp 8	New Monopole	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI
TOP	Topanga Peak	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
FRP	Frost Peak (Upper Blue Ridge)	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
TMT	Table Mountain	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
LACFCP09	County CP 9	New Monopole	Construction Impacts	NI	LTSM	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
LPC	Loop Canyon	New Monopole	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
H-69B	H-69B	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
SPN	Saddle Peak	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
JPK	Johnstone Peak - 1	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
JPK2	Johnstone Peak - 2	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI
SUN	Sunset Ridge	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
SUN2	Sunset Ridge-2	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
AGH	Agoura Hills	New Monopole	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
AJT	AeroJet	Existing Tower	Construction Impacts	NI	LTS	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
ASD	Auto Square Drive	New Monopole	Construction Impacts	NI	LTSM	LTSM	NI	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	LTS	NI	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
BJM	Black Jack Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
CPK	Castro Peak	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
DPK	Dakin Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
ENC1	Encinal 1 (Fire Camp 13)	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
FTP	Flint Peak	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
GMT	Grass Mountain	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
GRM	Green Mountain	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
H-17A	H-17A	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
JOP	Josephine Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS

Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
LACF072	County FS 72	New Monopole	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
LACFCP11	County CP 11	New Monopole	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
LARICSHQ	LA-RICS Headquarters Building	Roof Mount	Construction Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	LTS	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	LTS	NI	NI	NI	NI
LEPS	Lower Encinal Pump Station	New Monopole	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
MMC	Mount McDill	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
MML	Magic Mountain Link	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
MTL2	Mount Lukens-2	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
OAT	Oat Mountain-1	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
PASPD01	Pasadena Police Department	New Monopole	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	LTS	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	LTS	NI	NI	NI
PDC	Pacific Design Center	Roof Mount	Construction Impacts	NI	LTS	LTS	NI	LTS	LTS	NI	LTS	NI	LTS	LTS	NI	LTSM	NI	NI	NI
			Operational Impacts	NI	LTS	LTS	NI	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
PHN	Puente Hills	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
PMT	Pine Mountain	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
PWT	Portshead Tank	New Monopole	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
RIH	Rio Hondo	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	LTS	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	LTS	NI	LTS	NI
SDW	San Dimas	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	LTSM	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	LTS	NI	NI
SGH	Signal Hill	Existing Tower	Construction Impacts	NI	LTS	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
SIM	Simpsons' Building	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
TPK	Tejon Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
TWR	Tower Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
VPK	Verdugo Peak-2	New Tower	Construction Impacts	NI	LTSM	NI	LTSM	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
WAD	Walker Drive	Existing Monopole	Construction Impacts	NI	LTS	NI	LTS	LTS	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	LTS	NI	LTS	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
WMP	Whitaker Middle Peak	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI



GEOLOGY/SOILS, GREENHOUSE GASES, HAZARDS AND HAZARDOUS MATERIALS																			
Site ID	Site Name	Mono pole/ Tower	Impact Type	GEO-1A	GEO-1B	GEO-1C	GEO-1D	GEO-2	GEO-3	GEO-4	GHG-1	GHG-2	HAZ-1	HAZ-2	HAZ-3	HAZ-4	HAZ-5	HAZ-6	HAZ-7
WS1	100 Wilshire	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
WTR	Whittaker Ridge	New Tower	Construction Impacts	NI	LTSM	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI
ZHQ	Zuma Life Guard HQ	New Monopole	Construction Impacts	NI	LTSM	LTSM	NI	LTS	LTSM	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	LTS	NI	NI	LTS	NI	NI	LTS	NI	LTS	LTS	NI	NI	NI	NI

NI = No Impact
 LTS = Less than Significant Impact
 LTSM = Significant Impact Reduced to Less than Significant with Mitigation Incorporated
 SU = Significant and Unavoidable Impact



HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
BUR	Burnt Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
BUR1	Burnt Peak - 1	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
BUR2	Burnt Peak - 2	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
BUR3	Burnt Peak - 3	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
ENT	Entrada Tank Site	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	LTS	LTS	LTS	NI	NI
LACFCP08	Camp 8	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	LTS	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	LTS
TOP	Topanga Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
FRP	Frost Peak (Upper Blue Ridge)	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
TMT	Table Mountain	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI

HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
LACFCP09	County CP 9	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
LPC	Loop Canyon	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
H-69B	H-69B	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
SPN	Saddle Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
JPK	Johnstone Peak - 1	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
JPK2	Johnstone Peak - 2	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
SUN	Sunset Ridge	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
SUN2	Sunset Ridge-2	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI



HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
AGH	Agoura Hills	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
AJT	AeroJet	Existing Tower	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
ASD	Auto Square Drive	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
BJM	Black Jack Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	LTS	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	LTS	NI
CPK	Castro Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
DPK	Dakin Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	LTS	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	LTS
ENC1	Encinal 1 (Fire Camp 13)	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	LTSM	NI	NI	LTS	LTSM	LTSM	NI	LTS	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	LTS	NI	NI	LTS	LTS	LTS	NI	LTS	NI
FTP	Flint Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
GMT	Grass Mountain	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI



HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
GRM	Green Mountain	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
H-17A	H-17A	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
JOP	Josephine Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
LACF072	County FS 72	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	NI	LTS	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	LTS	NI
LACFCP11	County CP 11	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
LARICSHQ	LA-RICS Headquarters Building	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
LEPS	Lower Encinal Pump Station	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
MMC	Mount McDill	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI



HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
MML	Magic Mountain Link	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
MTL2	Mount Lukens-2	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
OAT	Oat Mountain-1	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
PASPD01	Pasadena Police Department	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	LTS	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	LTS	NI
PDC	Pacific Design Center	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
PHN	Puente Hills	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
PMT	Pine Mountain	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
PWT	Portshead Tank	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	LTSM	NI	NI	LTS	LTS	LTS	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	LTS	NI	NI	LTS	LTS	LTS	NI	NI	NI
RIH	Rio Hondo	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI

HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION

Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
SDW	San Dimas	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	LTS	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	LTS	NI	NI
SGH	Signal Hill	Existing Tower	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	LTS	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	LTS	NI	NI
SIM	Simpsons' Building	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
TPK	Tejon Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
TWR	Tower Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
VPK	Verdugo Peak-2	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
WAD	Walker Drive	Existing Monopole	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTS	LTS	NI	NI	NI
WMP	Whitaker Middle Peak	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI

HYDROLOGY/WATER QUALITY, LAND USE, NOISE, AND RECREATION																				
Site ID	Site Name	Mono pole/ Tower	Impact Type	WQ-1	WQ-2	WQ-3	WQ-4	WQ-5	WQ-6	WQ-7	WQ-8	WQ-9	LU-1	LU-2	NOI-1	NOI-2	NOI-3	NOI-4	NOI-5	REC-1
WS1	100 Wilshire	Roof Mount	Construction Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	LTS	LTSM	LTSM	LTS	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	LTS	LTS	LTS	LTS	NI
WTR	Whittaker Ridge	New Tower	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	NI	LTS	NI	NI	NI	NI	NI	NI	NI	NI	NI
ZHQ	Zuma Life Guard HQ	New Monopole	Construction Impacts	LTSM	LTS	NI	NI	LTS	LTS	LTS	LTS	LTS	NI	NI	LTS	LTS	LTSM	NI	NI	NI
			Operational Impacts	NI	LTS	NI	NI	LTS	LTS	LTS	LTS	LTS	LTS	NI	NI	LTS	LTS	LTS	NI	NI

NI = No Impact
 LTS = Less than Significant Impact
 LTSM = Significant Impact Reduced to Less than Significant with Mitigation Incorporated
 SU = Significant and Unavoidable Impact



TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
BUR	Burnt Peak	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
BUR1	Burnt Peak - 1	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
BUR2	Burnt Peak - 2	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
BUR3	Burnt Peak - 3	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
ENT	Entrada Tank Site	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
LACFCP08	Camp 8	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
TOP	Topanga Peak	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
FRP	Frost Peak (Upper Blue Ridge)	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
TMT	Table Mountain	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI

TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
LACFCP09	County CP 9	New Monopole	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
LPC	Loop Canyon	New Monopole	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
H-69B	H-69B	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
SPN	Saddle Peak	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
JPK	Johnstone Peak - 1	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
JPK2	Johnstone Peak - 2	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
SUN	Sunset Ridge	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
SUN2	Sunset Ridge-2	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI



TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
AGH	Agoura Hills	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
AJT	AeroJet	Existing Tower	Construction Impacts	LTS	NI	NI	LTS	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
ASD	Auto Square Drive	New Monopole	Construction Impacts	LTS	LTS	NI	LTSM	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
BJM	Black Jack Peak	New Tower	Construction Impacts	LTS	NI	LTSM	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	LTS	NI	NI	LTS	NI	LTS	NI
CPK	Castro Peak	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
DPK	Dakin Peak	New Tower	Construction Impacts	LTS	NI	LTSM	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	LTS	NI	NI	LTS	NI	LTS	NI
ENC1	Encinal 1 (Fire Camp 13)	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
FTP	Flint Peak	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
GMT	Grass Mountain	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI



TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
GRM	Green Mountain	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
H-17A	H-17A	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
JOP	Josephine Peak	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
LACF072	County FS 72	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
LACFCP11	County CP 11	New Monopole	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
LARICSHQ	LA-RICS Headquarters Building	Roof Mount	Construction Impacts	LTS	LTS	NI	LTSM	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
LEPS	Lower Encinal Pump Station	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
MMC	Mount McDill	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI

TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
MML	Magic Mountain Link	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
MTL2	Mount Lukens-2	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
OAT	Oat Mountain-1	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
PASPD01	Pasadena Police Department	New Monopole	Construction Impacts	LTS	LTS	NI	LTSM	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
PDC	Pacific Design Center	Roof Mount	Construction Impacts	LTS	LTS	NI	LTSM	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
PHN	Puente Hills	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
PMT	Pine Mountain	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
PWT	Portshead Tank	New Monopole	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
RIH	Rio Hondo	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI

TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
SDW	San Dimas	New Tower	Construction Impacts	LTS	LTS	LTSM	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	LTS	NI	NI	LTS	NI	LTS	NI
SGH	Signal Hill	Existing Tower	Construction Impacts	LTS	LTS	LTSM	LTSM	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	LTS	NI	NI	LTS	NI	LTS	NI
SIM	Simpsons' Building	Roof Mount	Construction Impacts	LTS	LTS	NI	LTSM	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
TPK	Tejon Peak	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
TWR	Tower Peak	New Tower	Construction Impacts	LTS	NI	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	NI	NI	NI	NI	LTS	NI	LTS	NI
VPK	Verdugo Peak-2	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
WAD	Walker Drive	Existing Monopole	Construction Impacts	LTS	LTS	NI	LTS	NI	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
WMP	Whitaker Middle Peak	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
WS1	100 Wilshire	Roof Mount	Construction Impacts	LTS	LTS	NI	LTSM	NI	LTS	LTS	LTS	NI

TRANSPORTATION, UTILITIES												
Site ID	Site Name	Monopole/ Tower	Impact Type	TRAN-1	TRAN-2	TRAN-3	TRAN-4	UTI-1	UTI-2	UTI-3	UTI-4	UTI-5
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
WTR	Whittaker Ridge	New Tower	Construction Impacts	LTS	LTS	NI	LTS	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI
ZHQ	Zuma Life Guard HQ	New Monopole	Construction Impacts	LTS	LTS	NI	LTSM	LTSM	LTS	LTS	LTS	NI
			Operational Impacts	LTS	LTS	NI	NI	NI	LTS	NI	LTS	NI

NI = No Impact
 LTS = Less than Significant Impact
 LTSM = Significant Impact Reduced to Less than Significant with Mitigation Incorporated
 SU = Significant and Unavoidable Impact



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Aesthetics	AES-1: Significant and Unavoidable	There are no mitigation measures that could feasibly reduce the significant impacts of the project.	H-69B & JOP
	AES-2: Less Than Significant	None required	All Sites
	AES-3: Significant and Unavoidable	There are no mitigation measures that could feasibly reduce the significant impacts of the project.	H-69B & JOP
	AES-3: Less Than Significant with Mitigation	CUL MM 5: Architectural Resources Protection and Camouflage: See Below	PASPD01
	AES-4: Less Than Significant	None required	All Sites
Air Quality	AQ-1: Less than Significant with Mitigation	AQ MM 1: No later than 12:00 p.m. on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NO _x emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) if combined NO _x emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which USEPA regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NO _x emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week’s report.	All Sites In SCAQMD
	AQ-2: Less than Significant with Mitigation	AQ MM 1: See Above	All Sites In SCAB
	AQ-3: Less than Significant with Mitigation	AQ MM 1: See Above	All Sites In SCAB
	AQ-4: Less Than Significant	None Required	All Sites
	AQ-5: Less Than Significant	None Required	All Sites
Biological Resources	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 1 Conservation Monitoring and Reporting Plan: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT,



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	<p>BIO-1: Significant Impact Reduced to Less than Significant with Mitigation</p>	<p>BIO MM 2 Worker Environmental Awareness Program: Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.</p> <ul style="list-style-type: none"> a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the proposed Project site. Training of additional workers, contractors, and visitors shall be provided, as needed. b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices, that include containment of any spills, disposal of trash, and management of runoff and sediment transport. c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site. 	<p>PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ</p> <p>AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ</p>



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 3 Biological Compliance Reporting: A biological monitor shall visit all active construction sites at least once weekly to document compliance and provide reports to the Project administrator on a weekly basis.	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 4 Site Sanitation: a) The contractor shall keep a regulated work area free of litter and trash. Trash and discarded food items shall be contained within an appropriate receptacle and removed daily to avoid attracting wildlife to the construction site, contribute to habituation of wildlife to the presence of humans, or to attract avian or mammalian predators to the area. b) All construction debris (including nuts, bolts, small pieces of wire, etc.) shall be cleaned up (e.g., trash removed, scrap materials picked up) each day that work is conducted to minimize the likelihood of wildlife visiting the site and consuming microtrash, discarded food, or other substances.	BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENT, FRP, GMT, H-17A, H-69B, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, RIH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WMP, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 5 Hazardous Materials Management: a) A toxic substance management and spill response plan shall be prepared by the contractor. b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately. c) All construction vehicles are required to carry at least one spill response kit. d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.	BJM, BUR, BUR1, BUR2, BUR3, DPK, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, TWR, VPK, WMP, WTR



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	<p>BIO-1: Significant Impact Reduced to Less than Significant with Mitigation</p>	<p>BIO MM 6 Anti-perch Devices: Anti-perch devices shall be affixed to any elevated, horizontal structure (this includes the top quarter-arc of disc antennas) suitable for perching or nesting by raptors, ravens, vultures, gulls, or other large birds to deter the use of these facilities as perch or nest sites to avoid attracting avian predators to the area, and so as not to contribute to the habituation of condors to the presence of humans. Anti-perch devices shall be inspected annually and repaired as needed.</p>	<p>BJM, BUR, BUR1, BUR2, BUR3, DPK, FRP, FTP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ</p>
	<p>BIO-1: Significant Impact Reduced to Less than Significant with Mitigation</p>	<p>BIO MM 7 California Condor Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 4 Site Sanitation, a written list of procedures shall be established and posted on site and/or kept in a site binder at all times. Specifically, the protocol shall list requirements including: all trash of any size shall be placed and contained in covered containers; and no trash of any kind shall be released to the environment. This includes any food items, small or large pieces of plastic or wire, and any small metallic objects (i.e., nuts, bolts, wire nuts). b) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of California condors. A qualified biologist shall prepare an informational handout to be presented at WEAP instruction. This program and handout shall provide, at a minimum, information concerning the biology and distribution of the California condor, legal status, and possible occurrence in the vicinity; measures to avoid impacts to condors; procedures to be implemented to eliminate microtrash from the site; and what to do in case of California condor encounters. The informational handout shall be posted at the Project site for continued reference by construction and maintenance workers. c) During construction and operations of the facility, all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the Project site. If condors are on site, USFWS would be contacted immediately (Ventura office: 805-644-1766) following internal chain-of-command communications protocol. Once condors leave on their own accord or as a result of techniques employed by permitted USFWS personnel, on-site work may continue. d) If condors are known to be present in the area and found roosting within 0.5 mile of the Project site, no construction activity shall occur between one hour before sunset and one hour after sunrise or until the condors leave the area. e) If condors are documented nesting within 1.5 miles of a proposed Project site (as determined by nesting bird surveys, observations by the biological monitor, and/or information from USFWS condor program), no construction activity shall occur until further 	<p>BUR, BUR1, BUR2, BUR3, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, VPK, WMP, WTR</p>

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		authorization is received from USFWS. f) The Project site shall be maintained in a clean condition at all times. g) All wires, cables, and other items, either temporary or permanent, that could entangle a condor are to be securely fastened down or removed from site. No permanent guy wires will be used. h) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that the Project site is maintained in a clean condition.	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 8 Biological Monitoring: A qualified biological monitor shall be present at the site during construction activities that result in ground disturbance or removal of vegetation to ensure all mitigation measures are met. Duties of the biological monitor include checking for the presence of wildlife on the construction site, inspecting trenches or holes for trapped wildlife, surveying for the presence of nesting birds and adherence to nesting bird protection buffers, monitoring construction site boundaries, and checking that vegetation flagged for protection is not disturbed.	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACFP072, LACFCP08, LACFCP09, LACFCP11, LEPS, LCP, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 9 Protect Native Vegetation and Common Wildlife: a) Minimize disturbance to native perennial plants; new ground disturbance shall be the minimum necessary and established and delineated prior to any earth-moving activities. b) If native perennial vegetation cannot be avoided and would be impacted or destroyed, the disturbance area is to be surveyed for the presence of special status plants and to remove common species of wildlife prior to destruction of the vegetation. c) At no time shall protected species be handled or moved. If a protected species is found within the construction area, all work that may impact that animal shall cease and the appropriate agency(s) shall be contacted (e.g., USFWS, CDFW, land management agency). The animal shall be allowed to leave the site on its own accord. d) Prior to construction or any ground-disturbance activities, mark the construction disturbance limits and monitor for adherence to these boundaries. e) Stay on existing roads. f) Do not remove native trees; construction limits shall be established to avoid walnuts, oaks, and any other sensitive species habitat and the limits shall be flagged by a biological monitor.	AGH, AJT, BJM, CPK, DPK, ENC1, ENT, FRP, FTP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACFP072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<ul style="list-style-type: none"> g) Protect tree root systems by precluding paving, trenching, or other ground disturbing activities; and preclude heavy equipment from driving, parking, or staging within the tree’s dripline. h) Any loss of native perennial vegetation, whether planned or unintentional, is to be accounted for in reports prepared by the biological monitor. 	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 10 No Pets: Construction and maintenance workers shall be prohibited from bringing pets (especially dogs) to non-urban Project sites, as the domestic animal may harass or kill native wildlife present at the site.	BJM, CPK, DPK, ENT, FRP, GRM, H-17A, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, PHN, PMT, PWT, PWT, RIH, SDW, SPN, SUN, SUN2 TMT, TOP, TPK, TWR, VPK, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 11 Site Access:</p> <ul style="list-style-type: none"> a) On access roads operate all vehicles within the posted speed limits. b) If access road speed limits are not posted, do not exceed 15 miles per hour (mph). c) Adjust vehicle speed as appropriate to road conditions; avoid causing ruts and gullies; and minimize dust. d) Watch for wildlife on roads (including amphibians, snakes, rodents, and tortoises), especially during rainy periods, and avoid running them over. e) Look under parked vehicles for the presence of wildlife (especially desert tortoise) before pulling away to avoid running over wildlife. f) Do not park on or drive over native perennial vegetation. g) Avoid cutting corners on access roads and impacting vegetation when large equipment and trailers are brought to the Project site. h) Do not drive off the designated roadway or make any modifications to the road or road shoulders. 	AGH, AJT, BJM, CPK, DPK, ENT, FRP, FTP, GRM, H-17A, H-69B, JOP, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2 TMT, TOP, TPK, TWR, VPK, WMP, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 12 Coastal California Gnatcatcher Protection:</p> <ul style="list-style-type: none"> a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation. b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial 	H-17A, LEPS, PHN, PWT, RIH, SDW, VPK

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection.</p> <p>c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed.</p>	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions: Construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation shall be precluded between February 15 and August 30. This measure is applicable to identified Project sites where coastal California gnatcatchers are known to be or likely would be present, and construction activities may result in disturbance to the bird.	H-17A, PHN, RIH, SDW
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 14 Coastal California Gnatcatcher Protocol Surveys:</p> <p>a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).</p> <p>b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the proposed Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.</p> <p>c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the proposed Project site, construction activities may commence beginning July 1 through February 14.</p> <p>e) Survey requirements shall be applied each year that construction activities take place at the Project site.</p>	LEPS, PWT
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 15 Southwestern Willow Flycatcher Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of southwestern willow flycatchers in the area and the importance of maintaining riparian vegetation.</p>	LACFCP11



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially riparian species (e.g., sycamore, cottonwood, willow), would be minimized; no ground-disturbing activities or removal of vegetation would occur within stream corridors or floodplains. Prior to construction, surveys for the presence of riparian vegetation shall be conducted by a qualified biologist, and those plants within or near the construction zone not identified for removal shall be marked for protection and monitored for adherence to these boundaries.</p>	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 16 Snowy Plover Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of western snowy plover in the area and the importance of not disturbing nesting birds.</p> <p>b) If construction occurs between February 1 and July 31, prior to beginning construction a biological monitor shall verify through coordination with USFWS and on-site surveys that no breeding western snowy plovers are using the Project site or are within 500 feet of any Project activity.</p> <p>c) If plovers are nesting in the vicinity, BIO MM 8 Biological Monitoring would apply, and a 500-foot protection buffer shall be required where no construction activities may occur while birds remain in the area.</p>	ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 17 Raptor Protection:</p> <p>a) If construction activities occur during the American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl breeding period, January 1 through July 31, preconstruction surveys would be conducted in all suitable habitats within 500 feet of the Project site as well as within a species-appropriate distance beyond the 500-foot buffer based on line of sight between potential nesting habitat and the construction site.</p> <p>b) If construction takes place during the breeding period, the biological monitor shall contact appropriate land management and resource agencies to ascertain if they have any current information on raptor nesting activities in the general vicinity of the proposed Project sites.</p> <p>c) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered within 500 feet of the construction site, work shall not be undertaken at that site until the nest is no longer active, with an additional five days to allow the fledging birds to disperse. An active nest is defined as one that is attended, built, maintained, or used by a pair of birds during a given breeding season, whether or not eggs are laid; a nest is considered inactive if not attended to for a period of 10 days or longer.</p> <p>d) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered between 500 feet and 0.5 mile of the construction site, the potential for disturbance of the nesting birds would be evaluated based on line-of-sight,</p>	AGH, AJT, BJM, CPK, DPK, ENC1, ENT, FTP, GMT, H-17A, H-69B, JOP, LACFCP08, OAT, PWT, SPN, TOP, TPK, TWR, VPK, WTR

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		degree of potentially disturbing activities, and other site-specific factors. If the CDFW and land management agency concur, the protection buffer distance may be reduced.	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 18 Nesting Bird Protection:</p> <ul style="list-style-type: none"> a) It is preferred that removal of trees or large tree limbs and other vegetation removal activities such as grubbing or shrub clearing avoid the typical bird nesting season of January 1 through September 15. b) If construction activities occur during the bird nesting season, and to prevent disturbance to or destruction of nests of protected native bird species that could occur as a result of vegetation removal, disturbance, or other on-site construction activities, preconstruction surveys for nesting birds shall be conducted by a qualified biological monitor within 10 calendar days prior to on-site construction-related disturbance activities from March 1 through September 15 for non-raptors, and January 1 through July 31 for raptors. c) If nesting protected non-raptor species are detected, a 300-foot avoidance buffer shall be implemented; a 500-foot avoidance buffer would be applied to any active nest of a raptor or other species of special status bird. d) Appropriate site-specific buffers may be established with the approval of a project designated avian expert, based in part on the species of nesting bird present, location of nest, nesting phenology, magnitude of potential disturbance, and other site conditions (e.g., levels of ambient noise; line-of-sight). e) If construction activities would occur within the general buffer distances for active nests (300 feet for non-raptors, 500 feet for raptors, and up to 1.5 miles for condors and eagles), a Biological Monitor must be present during those activities. f) No active nests may be destroyed; inactive bird nests may be destroyed as part of vegetation removal but may not be reduced to possession. g) Between September 16 and December 30, grubbing, shrub clearing, and tree/limb removal activities are not subject to restrictions based on the protection of migratory birds. h) Comply with the USFWS Office of Migratory Birds voluntary guidelines (USFWS 2013a) for communications tower placement, construction, and operation. i) For any towers that must exceed 199 feet in height, lighting requirements would be designed in cooperation with FAA and USFWS Office of Migratory Birds to minimize attraction and resulting mortality of migratory birds. 	AGH, AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>Bio MM 19 Trenches and Holes Management:</p> <ul style="list-style-type: none"> a) The contractor shall cover or backfill all trenches the same calendar day they are opened, where practicable. b) If trenches or holes cannot be closed the same day they are made, covers shall be firmly 	AGH, AJH, BJM, CPK, DPK, ENT, FRP, FTP, GRM, H-17A, H-69B, JOP, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS,



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor.</p> <p>c) Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped common wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species (e.g., arroyo toad) at Project sites that require the presence of a biological monitor.</p> <p>d) If a protected wildlife species is present in the trench, the on-site Biological Monitor shall contact USFWS immediately, ensure the protected species is not in immediate danger, and wait for instruction by USFWS.</p> <p>e) Covered trenches and holes at sites where biological monitors are present are to be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day.</p> <p>f) In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized.</p> <p>g) Prior to trenching, the construction disturbance limits and monitor for adherence to these boundaries shall be marked.</p>	LPC, MMC, MML, MTL2, OAT, PHN, PMT, PWT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, WMP, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 20 Santa Catalina Island Fox Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of the Santa Catalina Island fox and the measures to be taken to avoid impacts to the fox.</p> <p>b) Prior to initiation of construction activities, the Project site plus a 250-foot buffer shall be inspected by a qualified biologist for the presence of Santa Catalina Island fox dens; if a den is located, no construction activities may be initiated and USFWS and CDFW shall be contacted.</p> <p>c) As part of the BIO MM 8 Biological Monitoring, the biological monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of foxes each day prior to initiation of on-site work. Construction equipment that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) shall be inspected prior to moving.</p>	BJM, DPK, TWR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 21 Protected Amphibian Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of protected amphibians (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) in the area and along access roads, and the measures to be taken to avoid impacts to these amphibians.</p> <p>b) As part of BIO MM 1 Biological Monitoring, the Biological Monitor shall be present during site preparation and placement of Project equipment. The monitor shall inspect the work</p>	CPK, FRP, GRM, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TMT, TOP, WMP, WTR



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>area, including equipment storage sites and staging areas, for the presence of protected amphibians each day prior to initiation of on-site construction work following a measureable rain event (≥ 0.01 inch) while construction is ongoing.</p> <p>c) To protect dispersing frogs and toads, no Project-related on-site ground-disturbing activities or construction-related travel on access roads shall occur during the night or during rainy periods (within 24 hours of a measureable ≥ 0.01 inch) precipitation event or within 48 hours of a major ≥ 0.1 inch) precipitation event).</p> <p>d) To protect dispersing frogs and toads during normal site operations (non-emergency situations), these Project sites shall not be accessed by maintenance workers during the night or during rainy periods (within 24 hours of a measureable ≥ 0.01 inch) precipitation event or within 48 hours of a major ≥ 0.1 inch) precipitation event) (emergency situations are exempted).</p> <p>e) If a protected amphibian (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) is found within 50 feet of the construction site, all work that involves moving vehicles or ground disturbance shall cease until the animal moves on its own accord.</p> <p>f) If protected amphibians are present on the road, vehicles shall stop until the individual(s) move out of harm's way on their own accord.</p>	
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 22 Monarch Butterfly Protection:</p> <p>a) Preconstruction surveys by a qualified biologist shall provide for a thorough examination of suitable roost trees to determine if butterflies are using the site for roosting; surveys shall be repeated once a week throughout the construction period.</p> <p>b) If butterflies are found roosting in the area, a protection buffer of 50 feet shall be established around each roost; and no construction activities would be undertaken within the buffer area while butterflies are roosting.</p> <p>c) Loss of trees or removal of large limbs on trees that may provide suitable roost habitat for monarch butterflies shall be avoided.</p>	ENC1, ENT, H-69B, LACF072, LEPS, TOP, WAD
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 23 Prevent the Spread of Nonnative Vegetation:</p> <p>a) All ground disturbed by construction activities that would not be paved, landscaped, or otherwise permanently stabilized (e.g., graveled, soil compaction) shall be seeded using species native to the Project vicinity.</p> <p>b) To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be inspected at the equipment storage facility to remove soil and vegetation; and the equipment shall be washed prior to entering the construction</p>	AGH, AJT, BJM, CPK, DPK ENC1, ENT, FRP, FTP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MML, MTL2, OAT, PHN, PMT PWT, RIH, SDW, SPN, TMT, TOP,



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>site.</p> <p>c) To prevent invasive species seeds from leaving the site, all construction equipment shall be inspected, and all attached plant/vegetation and soil/mud debris shall be removed prior to leaving the construction site.</p>	TWR, VPK, WTR
	BIO-1: Significant Impact Reduced to Less than Significant with Mitigation	<p>BIO MM 24 Special Status Plants Surveys and Protection:</p> <p>a) As part of BIO MM 2 WEAP, construction crews shall be informed prior to the onset of construction activities of the possible presence of special status plants in the area and the importance of maintaining native vegetation.</p> <p>b) At identified sites, surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities, in the proper season and in suitable habitat surrounding the proposed Project site or any area subject to ground disturbance, including access roads.</p> <p>c) If a special status plant is found to be present or if surveys are determined to be inconclusive, the areas requiring special protection would be marked prior to construction to provide a buffer to maintain the ecological context of the location at which the plant was found.</p> <p>d) Mitigation measure BIO MM 8 Biological Monitoring shall apply at proposed Project sites where special status plants or their habitat are present, and protection buffers would be monitored for compliance.</p>	AGH, BJM, CPK, DPK ENC1, ENT, FRP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LEPS, LPC, MTL2, PMT PWT, RIH,SPN, TMT, TOP, TWR, VPK, WTR
	BIO-2: Significant Impact Reduced to Less than Significant with Mitigations	<p>See above for detailed discussion of measures provided below.</p> <p>BIO MM 1 Mitigation Monitoring and Reporting Plan</p> <p>BIO MM 2 Worker Environmental Awareness Program</p> <p>BIO MM 3 Biological Compliance Reporting</p> <p>BIO MM 5 Hazardous Materials Management</p> <p>BIO MM 6 Anti-perch Devices</p> <p>BIO MM 8 Biological Monitoring</p> <p>BIO MM 9 Protect Native Vegetation and Common Wildlife</p> <p>BIO MM 10 No Pets</p> <p>BIO MM 11 Site Access</p> <p>BIO MM 12 Coastal California Gnatcatcher Protection of Habitat</p> <p>BIO MM 19 Trenches and Holes Management</p> <p>BIO MM 23 Prevent the Spread of Nonnative Vegetation</p> <p>BIO MM 24 Special Status Plants Surveys and Protection</p>	AGH, AJT, FTP, GRM, H-17A, JOP, LACF072, LACFCP11, LEPS, LPC, MML, OAT, PHN, RIH,SDW, TPK, WMP, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
	BIO-3: Less than Significant	None Required.	All Sites.
	BIO-4: Less than Significant Impact	See above for detailed discussion of measures listed below. BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 Worker Environmental Awareness Program BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 19 Trenches and Holes Management	CPK, FRP, JPK, LACFCP09, LACFCP11, LCP, MML,OAT, PMT, SUN, SUN2, TMT
	BIO-5: Significant Impact Reduced to Less than Significant With Mitigation	BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 Worker Environmental Awareness Program BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Instructions BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection of Habitat BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions BIO MM 14 Coastal California Gnatcatcher Protocol Surveys BIO MM 15 Southwestern Willow Flycatcher Protection BIO MM 16 Snowy Plover Protection BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 21 Protected Amphibian Protection BIO MM 22 Monarch Butterfly Protection	AJT, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, FRP, GMT, GRM, H-69B, JPK, JPK2, JOP, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MML, MTL2,OAT, PHN, PMT, PWT, RIH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, WMP, WTR, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection	
	BIO-6: Less than Significant Impact	None Required.	MMC,
Cultural Resources	CUL-1: Significant and Unavoidable	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources At Project sites with known or potential presence of prehistoric archaeological material (artifacts and/or features) within the defined APEs, qualified archaeological or Native American monitors shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined in Section 3.4.3.4. The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm. In the event that prehistoric archaeological material is unexpectedly discovered within the APE, the procedures set forth in CUL MM 3 shall be followed.</p> <p>CUL MM 2: Archaeological Monitoring – Historic-Age Resources At LMR sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section. The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.</p> <p>CUL MM 3: Unexpected Discovery of Archaeological Materials In the event that previously unidentified prehistoric or historic-age archaeological resources are uncovered, the following actions shall be taken:</p>	H-69B, LACFCP08, LACFCP09, LPC

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<ol style="list-style-type: none"> 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. The qualified archaeological monitor will mark the immediate area with highly visible flagging and immediately notify the Project Archaeologist. 2) The Project Archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms, and no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the Project Archaeologist shall evaluate the resource and determine whether it is (1) eligible for inclusion in the NRHP and is thus a historic property for the purposes of the NHPA and NEPA; (2) eligible for the CRHR and thus a historical resource for the purposes of CEQA; (3) a “unique” archaeological resource as defined by CEQA; (4) a Tribal resource as defined by AB 52. If the resource is determined not to be significant under any of these four categories, work may commence in the area following collection (as appropriate) and recording, including mapping and photography, of the archaeological materials or features. 4) If the resource meets the criteria for any or all of the categories described in CUL MM3 (3), work shall remain halted, and the Project Archaeologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse changes occur. Preservation in place (i.e., avoidance) is the preferred method of ensuring no substantial adverse impacts occur on historic properties/historical resources and shall be required unless other equally effective methods are agreed upon among the Project Archaeologist, the Authority, and any other stakeholders. If the archaeological material appears to represent a site – defined as three or more artifacts and/or features in an intact deposit – an archaeological test program (Phase II) may be necessary. Associated mitigation measures include, but are not limited to, collection of the archaeological materials, recordation (e.g., DPR Primary Record and Site Forms), and analysis of any significant cultural materials in accordance with a Data Recovery Plan, and curation of artifacts at an approved curation facility. A curation agreement for this Project is already in place with the University of California, Los Angeles, Archaeological Collections Facility at the Fowler Museum. At the completion of the appropriate mitigation measures, a professional-level technical report shall be filed with the appropriate California Historical Resources Information System (CHRIS) Information Center (IC). 5) Work at the project location may commence upon completion of the appropriate mitigation treatment(s). 	

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>CUL MM 4: Unexpected Discovery of Human Remains In the event that human remains are unexpectedly encountered, the following procedures shall immediately be followed. This guidance is also provided on the NAHC's website at http://nahc.ca.gov/resources/discovery-of-native-american-human-remains-what-to-do/.</p> <ol style="list-style-type: none"> 1) All construction activity shall stop immediately, and the Project Archaeologist shall be notified. The Project Archaeologist will contact the Los Angeles (or applicable) County Coroner. The list of California Coroners can be found on the Native American Heritage Commission's website at http://nahc.ca.gov/2015/06/implementation-of-ab52-sample-letters-request-for-formal-notification-and-request-for-consultation/. 2) The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. 3) The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. 4) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. 5) If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; 6) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission. <p>CUL MM 5: Architectural Resources Protection and Camouflage Attachment of Equipment to Historic Buildings and Structures Exterior antennas, wiring, towers, and other LMR equipment that are proposed to be attached to buildings, structures, objects, and other features that are listed, eligible, or potentially eligible for inclusion in the NRHP or CRHR, or are locally-designated landmarks under CEQA may cause an adverse direct and/or visual effect. Mitigation measures to offset potential effects would include review of the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Guidelines), which can be found on the National Park Service's website at http://www.nps.gov/tps/standards.htm and http://www.nps.gov/tps/standards/four-treatments/standguide/index.htm respectively. The Standards are a series of practices for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines assist in applying the complementary Standards to a specific</p>	

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>property. Together, they provide a framework and guidance for decision-making about work or changes to a historical resource.</p> <p>For historic buildings or structures where communications-related equipment will be attached, the following preservation practices would shall be employed, as applicable, to ensure that impacts are less than :significant:</p> <ol style="list-style-type: none"> 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an unobtrusive area on the side of the building, i.e., an area that [insert language characterizing what it means to be “unobtrusive” for purposes of this measure to ensure no impact]. 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, nonpenetrating mounts shall be used. 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment. 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable. 5) Any supports or brackets for new equipment shall be color-matched to the existing materials. 6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact. 7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized. 8) Rust-resistant mounts to prevent staining of the building materials shall be used. 9) Reversible mounting techniques shall be used to avoid damage to building materials. 10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building. 	



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		11) New interior wiring shall utilize space in existing chases, closets, or shafts. 12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material. 13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems. Architectural Camouflage All new towers and monopoles or a proposed increase in the height of existing towers and monopoles may that would cause adverse visual impacts on historical resources that are adjacent or within the viewshed shall be camouflaged. All Camouflage implemented for the proposed Project designs would shall be sympathetic to the existing landscape, and visually compatible with the surrounding architecture, and acceptable to the property owner and/or host community. Tower disguises may include, but are not limited to, painting and various types of concealments, including (e.g., clock/water towers, flag/light poles, silos, trees, and unique site-specific designs). Such measures must also be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above). As noted within the required mitigation measures for some Project sites, the painting of towers of certain heights is controlled by FAA Advisory Circulars 47 CFR § 17.21-17.58 to prevent aviation hazards; therefore, painting would not, be a feasible mitigation at those sites.	
	CUL-1: Less Than Significant with Mitigation	CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains CUL MM 5: Architectural Resources Protection and Camouflage	ENC1, PASPD01, PWT, TOP, WAD, ZHQ
	CUL-2: Significant and Unavoidable	CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 2: Archaeological Monitoring – Historic Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains	H-69B, LACFCP08, LACFCP09, LPC
	CUL-2: Less Than Significant with Mitigation	CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains	ENC1, PWT, TOP, ZHQ
	CUL-3: Less than Significant with Mitigation	CUL MM 6: Potential Paleontological Resources Proposed Project sites with the potential for paleontological resources would require preparation of a paleontological monitoring plan and a qualified paleontological monitor to be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations.	AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, , LACFCP08, LARICSHQ, LEPS, SPN, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, ,



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required. 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is “unique” under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area. 4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards. 5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist at project-specific inspections to collect matrix samples for processing. 6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository. 7) All recovered fossils shall be curated at a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority. 	TOP, WS1, ZHQ
	CUL-4: Significant and Unavoidable	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains</p>	H-69B
	CUL-4: Less Than Significant with Mitigation	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains</p>	ENC1, PWT, TOP, ZHQ
	CUL-5: Significant and Unavoidable	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources</p>	H-69B



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains</p>	
	CUL-5: Less Than Significant with Mitigation	<p>CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources CUL MM 3: Unexpected Discovery of Archaeological Materials CUL MM 4: Unexpected Discovery of Human Remains</p>	ENC1, PWT, TOP, ZHQ
Geology and Soils	GEO-1: Less than Significant with Mitigation	<p>GEO MM 1 : Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the project sponsor shall:</p> <ol style="list-style-type: none"> 1) Submit to the appropriate municipality (County of Los Angeles, County of San Bernardino, or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall: <ol style="list-style-type: none"> a. include an analysis of the expected ground motions at the site from known active faults using accepted methodologies b. include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013. c. Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as: <ol style="list-style-type: none"> i. subsurface soil improvement ii. deep foundations extending below the liquefiable layers iii. structural slabs designed to span across areas of non-support iv. soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones v. dynamic compaction vi. compaction grouting vii. jet grouting viii. mitigation for liquefaction hazards suggested in the California Geological Survey’s (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, 	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<p>and structural design that can withstand predicated displacements</p> <ul style="list-style-type: none"> d. Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults e. Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements <ul style="list-style-type: none"> 2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations. 3) The project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements. 4) Site construction shall not begin until: <ul style="list-style-type: none"> a. The registered geotechnical engineer representing the applicable permitting municipality for the project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and b. The applicable permitting municipality for the project site (county or city) has reviewed all project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements 	
	GEO-2: Less than Significant Impact	None Required	All Sites.
	GEO-3: Less than Significant with Mitigation	GEO MM 1: See above	ASD, CPK, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, PDC, RIH, SDW, SPN, TOP, VPK, WAD, ZHQ
	GEO-4: No Impact	None Required	All Sites
Green House Gases	GHG-1: Less than Significant Impact	None Required	All Sites
	GHG-2: Less than Significant Impact	None Required	All Sites
Hazards and Hazardous	HAZ-1: Less than Significant Impacts	None Required	All Sites



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
Materials	HAZ-2: Less than Significant Impacts	None Required	All Sites
	HAZ-3: Less than Significant Impacts	None Required	All Sites
	HAZ-4: Less than Significant with Mitigation	<p>HAZ MM 1: Prior to construction activity, the construction contractor must prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.</p> <ul style="list-style-type: none"> Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities. If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required. If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety. If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered. The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed. 	PDC
	HAZ-5: Less than Significant with Mitigation	<p>HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation."</p>	SDW
	HAZ-6: No impact	None Required	All Sites
	HAZ-7: Less than Significant Impacts	None Required	All Sites
	HAZ-8: Less than Significant with Mitigation	<p>HAZ MM 3: Fire Management Plan. Prior to construction activity, the Authority must work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., "red flag" days), level of suppression equipment required on site, training requirements, and points of contact.</p>	AGH, AJT ,BJM , BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT,



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
			PHN, PMT, PWT, RIH, SDW, SIM, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
Hydrology/ Water Quality	WQ-1: Less than Significant with Mitigation	UTL MM 1: See below	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	WQ-2: Less than Significant Impacts	None Required	All Sites
	WQ-3: No Impact	None Required	All Sites
	WQ-4: No Impact	None Required	All Sites
	WQ-5: Less than Significant Impacts	None Required	All Sites
	WQ-6: Less than Significant Impacts	None Required	All Sites
	WQ-7: Less than Significant Impacts	None Required	ZHQ
	WQ-8: Less than Significant Impacts	None Required	ZHQ
	WQ-9: Less than Significant with Mitigation	GEO MM 1	ENC1, PWT, ZHQ
Land Use	LU-1: No Impact	None Required	All sites
	LU-2: No impact	None Required	All Sites
Noise	NOI-1: Less than Significant Impacts	None Required	All Sites
	NOI-2: Less than Significant with Mitigation	<p>NOI MM 1: Prior to commencement of construction at sites ENC1 and LACF072, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available. Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible. 	ENC1, LACF072



Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		<ul style="list-style-type: none"> Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately. 	
	NOI-3: Less than Significant with Mitigation	<p>NOI MM 2: Prior to commencement of construction at Site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:</p> <ul style="list-style-type: none"> Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers. Use well-maintained equipment and have equipment inspected regularly. Operate construction equipment for periods of fewer than 15 consecutive minutes when possible. <p>NOI MM 3: Prior to commencement of construction at any site with an applicable¹ noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.</p>	WS1
	NOI-4: Less than Significant Impacts	None Required	All Sites
	NOI-5: Less than Significant Impacts	None Required	All Sites
Recreation	REC-1: No Impact	None Required	All Sites
	TRANS-1: Less than Significant Impacts	None Required	All Sites
	TRANS-2: Less than Significant Impacts	None Required	All Sites
	TRANS-3: Significant Impact Reduced to Less than Significant with Mitigation	<p>HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation.": See above</p>	BJM, DPK, SDW, SGH
Transportation/ Traffic	TRANS-4: Less than Significant with Mitigation	<p>TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.</p> <p>TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be</p>	ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, ZHQ

¹ The LA-RICS Authority is not subject to certain local noise ordinances under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)).

Table ES-2: Environmental Impacts and Mitigation Measures

Resource Area	Impact	Mitigation Measure	Sites
		coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.	
Utilities/Service Systems	UTL-1: Significant Impact Reduced to Less than Significant with Mitigation	UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.	AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2,LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, ZHQ
	UTL-2: Less than Significant Impacts	None Required	All Sites
	UTL-3: Less than Significant Impacts	None Required	All Sites
	UTL-4: Less than Significant Impacts	None Required	All Sites
	UTL-5: Less than Significant Impacts	None Required	All Sites

1.0 Introduction

1.1 Project History/Background and Summary of Proposed Project

1.1.1 Project History

In April 2005, the Regional Interoperable Steering Committee was formed to explore the development of a single, shared communications system for all public safety agencies in the greater Los Angeles region. Initial feasibility studies indicated that by leveraging various agency efforts, a shared regional communications system would not only be possible but would also best meet and exceed the needs of the entire regional public safety community and the general public. As a result, the County of Los Angeles (County), 82 municipalities, and three other public sector entities in the region drafted a Joint Powers Agreement that established the Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (Authority) to create a regional, area-wide, interoperable public safety communications network. Community safety institutions anchoring the Authority include police, sheriff, and fire departments, as well as hospitals.

1.1.2 Project Background

Los Angeles County experiences many man-made and natural incidents that require a rapid, coordinated response among the region's first and secondary responders. Public safety services in Los Angeles County are provided by more than 80 public safety agencies represented by approximately 34,000 first responders and 17,000 secondary responders serving more than 10 million residents, as well as tourists and commuters. Many of these agencies use systems that have exceeded their natural useful life (i.e., equipment and programming are no longer supported by vendors). Due to the numerous systems in use and the number of agencies, interagency communication is challenging.

Most of the region's public safety telecommunications infrastructure (equipment shelters and communications towers) does not meet the technical or operational needs of the agencies that utilize them. Many of the aging communications system sites were built to older and now obsolete industry standards and building codes. Structures at these sites no longer meet the more stringent performance and survivability requirements in current industry standards and codes. This causes performance issues that hamper public safety and emergency response operations. Most of the current infrastructure has not undergone a significant rebuild in several decades. Besides the overall age of many structures, most do not provide space (inside a shelter and/or on a tower) to add equipment; and, in many cases, the towers cannot be cost-effectively retrofitted to support additional antennas because they lack structural capacity and/or retrofitting would impact existing operations. Some towers do not have sufficient space to maintain adequate separation between existing and new antennas to minimize physical and electromagnetic interference.

Additionally, the communication systems deployed by agencies in Los Angeles County do not provide the necessary coverage that all users need. These agencies cover large tracts of the county, and their current radio systems are inadequate and/or antiquated. Separate but simultaneous incidents require

coordinated emergency responses to ensure adequate and appropriate personnel are dispatched to each incident. The lack of complete coverage sometimes results in the departments not being able to dispatch the nearest team to the incident because of communication problems.

Without adequate capacity on the radio system, even on a daily basis, first responders often struggle to acquire the necessary resources to communicate. The issue is exacerbated on large incidents where a shortage of radio resources greatly impacts operations due to the need for multiple command, tactical, and mutual aid channels. For example, first responders may not be able to request additional resources to assist them in life-threatening situations, hear evacuation orders, or hear broadcasted warning messages from dispatchers. Without adequate capacity to dedicate individual radio channels to individual incidents, the likelihood of interference between units responding to separate incidents is high.

1.1.3 Project Summary

1.1.3.1 *Land Mobile Radio Project*

The Land Mobile Radio (LMR) system is a wireless communications system for mobile and portable devices such as walkie-talkies and two-way radios. The LMR system would consist of antennas and support equipment at up to 90 sites, narrowed from a pool of 94 potential sites, located primarily in Los Angeles County. LMR antennas would be installed on the rooftops of existing buildings or on existing or new monopoles and lattice tower support structures. The LMR sites would contain the infrastructure and equipment necessary to provide day-to-day voice and narrowband data radio communications coverage for emergency responders throughout the County. These sites are widely dispersed across the County in both urban and rural settings and include mountain peaks and coastal and high desert locations, as well as downtown Los Angeles.

1.1.3.2 *Relationship to Long Term Evolution Project*

The Long Term Evolution (LTE) broadband communications system is a separate project being carried out by the LA-RICS Authority. The LTE system will provide wireless day-to-day broadband data communications service. The Authority approved sites in the LTE project in 2014 and 2015 and determined that all LTE sites were exempt from review under the California Environmental Quality Act (CEQA) pursuant to Public Resources Code section 21080.25, the statutory CEQA exemption specifically adopted for the LA-RICS. The environmental impacts from the installation and operation of the LTE Project were analyzed under the National Environmental Policy Act (NEPA) in the Broadband Technology Opportunities Program (BTOP) Environmental Assessment (EA) (October 2014) and two supplemental EAs released in July 2015 and August 2015. Construction of LTE sites began in December 2014 and was completed in December 2015.

LMR system infrastructure is proposed at some of the previously-approved LTE sites. Where feasible, the proposed LMR system design makes use of LTE and other existing communications support infrastructure.

1.2 Environmental Review Process

1.2.1 California Environmental Quality Act

The overall intent of the California Environmental Quality Act, Public Resources Codes (PRC) Section 21000 et seq. (CEQA) is to:

- Identify the significant effects to the environment of a proposed project, identify possible ways to avoid or minimize those significant effects, where feasible, and identify reasonable alternatives
- Disclose the Project's environmental effects to the public, the agency decision-makers who would approve or deny the Project, and the responsible and trustee agencies charged with managing resources (e.g., wildlife, air quality) that may be affected by the Project
- Provide a forum for public participation in the decision-making process with respect to environmental effects

This Draft Environmental Impact Report (EIR) was prepared in accordance with CEQA and the CEQA Guidelines (14 California Code of Regulations [CCR] § 15000 et seq.) and is intended to provide the environmental information necessary for the Authority to make final decisions on the construction and operation of the LMR Project. The Authority is identified as the Lead Agency for the proposed Project in accordance with CEQA. This Draft EIR is also intended to support discretionary reviews and decisions related to the Project by other agencies that are listed in Section 1.5. Implementation of the Project will require other discretionary actions by other government agencies, as described in Section 1.6.

CEQA has detailed requirements for the environmental review process for an EIR, which are summarized in this section.

A Notice of Preparation (NOP) accompanied by an Initial Study was distributed to the California State Clearinghouse and to other public agencies, and these are included in Appendix A of this document. The review period for the Initial Study was from August 27 to September 26, 2014. Scoping meetings were held at the following locations:

Table 1.2-1: Scoping Meeting Locations and Dates

Location	Date
South Coast Air Quality Management District Building Room GB, 21865 Copley Drive, Diamond Bar, California (CA)	September 11, 2014
Stanley Kleiner Activity Center 43011 10th Street West, Lancaster, CA	September 15, 2014
El Camino Real Charter High School Auditorium 5440 Valley Circle Boulevard, Woodland Hills, CA	September 16, 2014
Peck Park Community Center Auditorium 560 N. Western Avenue, San Pedro, CA	September 17, 2014
City of Lynwood, Bateman Hall Room 2 11331 Ernestine Avenue, Lynwood CA	September 18, 2014

Comments received on the Initial Study and during the scoping meetings have been considered and addressed in this document where applicable.

This Draft EIR will be subject to a 45-day public review and comment period as mandated by CEQA (Guidelines §15105). During this time, interested parties may prepare and submit written comments on the Draft EIR, which will be considered and incorporated into the Final EIR as appropriate.

During the public review and comment period, the Authority will hold a series of public meetings at the same locations where the scoping meetings were held. The purpose of the meetings is to provide opportunity to take public testimony on the Draft EIR. Responses will be prepared for all oral and written comments on environmental issues received at the public meetings, as well as for all written comments on environmental issues received during the public comment period. Responses to comments will be included as part of the Final EIR. As required by CEQA, proposed responses to comments submitted by responsible public agencies will be distributed to those agencies for review at least 10 days prior to consideration of the Final EIR by the Authority.

Prior to taking action on the proposed Project, the LA-RICS Authority Board will consider the adequacy of the Final EIR. If the Authority Board decides to approve the proposed Project, it will certify the Final EIR; make all required environmental findings; adopt a Mitigation Monitoring and Reporting Program; and, if necessary, adopt a Statement of Overriding Considerations.

1.2.2 National Environmental Policy Act

The U.S Department of Homeland Security, Federal Emergency Management Agency (FEMA) is proposing to support funding of the construction of the LMR facilities. As a federal agency, FEMA is subject to the NEPA and is required to complete NEPA analysis before taking action, including allocating Federal funds used to support LMR construction. NEPA analysis for the LMR project is currently ongoing separately from the CEQA process.

1.3 Scope of the EIR

Based on the analysis undertaken in the Initial Study, the Authority determined that the proposed Project may have a significant effect on the environment and that the preparation of an EIR is required for compliance with CEQA. As a result of the analysis undertaken in the Initial Study (see Appendix A-2), it was determined that the proposed Project would not result in impacts to Agriculture and Forestry Resources, Mineral Resources, Population and Housing, and Public Services (see Section 1.3.1). These resource areas will receive no further analysis in this document. The analysis in the Initial Study concluded that the Project has the potential to result in significant impacts related to 13 environmental topics identified in the Appendix G checklist to the CEQA Guidelines, which are the subject of the detailed evaluation undertaken in this EIR. These are:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Recreation
- Transportation/Traffic
- Utilities and Service Systems

In addition, the EIR addresses the cumulative impacts of the proposed Project, in connection with other past, present, and reasonably foreseeable projects, on these resources. The EIR also addresses the potential growth-inducing impacts of the proposed Project and CEQA mandatory findings of significance.

1.3.1 Environmental Issues Determined Not to be Significant

The Initial Study determined that the proposed Project would not result in potentially significant impacts to some environmental resource areas and that no further analysis of these resource areas is warranted. A summary of the findings of the Initial Study for these resources is provided below.

Agriculture and Forestry Resources. None of the proposed Project sites are in areas mapped as farmland or are currently used for agriculture or forestry or are forest land. The Project would not involve any activities that would convert farmland or forest land to other uses.

Mineral Resources. None of the proposed Project sites are currently being used for mineral resource extraction. All of the sites are proposed at locations where existing facilities and structures preclude use of the area for mineral resource extraction; therefore, implementation of the Project would not result in a change in site conditions that would affect availability of mineral resources.

Population and Housing. The proposed Project is intended to improve and facilitate communications among emergency responders and would not provide infrastructure that could induce population growth. The Project would result in a short-term increase in construction employment spread throughout Los Angeles County that could be met by the existing work force in the area. It would not result in an increase in long-term employment. It would not displace housing or people.

Public Services. The proposed Project would not result in the need for additional fire and police facilities, would not increase school populations, would not affect development or use of parks, and would not result in significant impacts to other public facilities.

1.3.2 Statutory Exemption

In 2012, the California Legislature, in recognition of the urgent need for the LA-RICS, granted the Authority a limited statutory exemption from CEQA (PRC § 21080.25.) for both LMR and LTE system sites. PRC section 21080.25 exempts the design, site acquisition, construction, operation, and maintenance of the LA-RICS LMR system from CEQA review so long as each individual project site meets the following criteria:

- The site is publicly owned and already contains an antenna support structure and/or is a police, sheriff, or fire station, or other public facility that transmits or receives public safety radio signals.
- Construction and implementation at the project site would not have a substantial adverse impact on wetlands, riparian areas, or habitat of significant value and would not harm any species protected by the federal Endangered Species Act of 1973 (16 United States Code [U.S.C.] Section 1531 et seq.), the Native Plant Protection Act (Chapter 10, commencing with Section 1900, of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5 [commencing with Section 2050] of Division 3 of the Fish and Game Code), or the habitat of those species.
- Construction and implementation at the project site would not have a substantial adverse impact on historical resources pursuant to PRC Section 21084.1
- Operation of LMR facilities at the site would not exceed the maximum permissible exposure standards established by the Federal Communications Commission (FCC), as set forth in Sections 1.1307 and 1.1310 of Title 47 of the Code of Federal Regulations (CFR).

- The LMR antenna support structures at the site would comply with applicable state and federal height restrictions, and any height restrictions mandated by an applicable comprehensive land use plan adopted by an airport land use commission. Any new lattice towers shall not exceed 180 feet in height without appurtenances and attachments, and any new monopoles shall not exceed 70 feet in height without appurtenances and attachments.
- Each new central system switch is located within an existing enclosed structure at a publicly owned project site, or is housed at an existing private communications facility.
- None of the sites are located on a school or sacred cultural site.

On November 13, 2014, the Authority determined, based on substantial evidence, that 26 potential LMR sites meet all of the required criteria for exemption from CEQA and authorized project construction, implementation, and operation at these sites. On February 5, 2015, and on December 17, 2015, the Authority determined respectively that an additional 13 and an additional 12 LMR sites meet the criteria for exemption from CEQA and authorized project construction, implementation, and operation at these sites. Of these 51 sites previously exempted, 11 are no longer being considered for development.

Table 1.3-1 identifies all of the sites at which the Authority has previously determined that LMR activities are statutorily exempt from CEQA. All of the previously-approved, statutorily exempt LMR sites have independent utility from the LMR system as a whole. Specifically, construction and implementation of LMR facilities at these sites would provide significant improvements to the emergency responder communication system within the County. This is true regardless of whether additional LMR system facilities are constructed. The LMR facilities proposed for a site can function independently of other LMR facilities. Construction and implementation of LMR infrastructure at these sites does not commit or compel the Authority to construct any additional LMR facilities or infrastructure (i.e., those sites addressed in this EIR). Conversely, a determination that a site is statutorily exempt does not commit the Authority to construct that site; therefore, the sites listed in Table 1.3-1 may not all be constructed.²

All proposed LMR sites that are not exempt from CEQA under the statutory exemption in PRC section 21080.25 are evaluated at a project level in this EIR. Construction and implementation of LMR infrastructure at these non-CEQA-exempt sites would occur only if the Authority certifies the EIR and approves construction of LMR facilities at these sites. As with the CEQA-exempt sites, certification of the EIR does not commit the Authority to construct all the sites addressed as part of the proposed Project in this EIR. The sites evaluated in this EIR are listed in Table 2.1-1. Although the statutorily exempt sites are not included in the project-level analysis in this EIR, they are considered in the cumulative impact analysis.

² A number of the sites that were exempted from CEQA have subsequently been removed from further consideration for LMR and are not listed in Table 1.3-1.

Table 1.3-1: Statutorily Exempt LMR Sites

Site ID	Site Name	Street Address	City	ZIP Code
APC	Airport Courthouse	11701 S. La Cienega Blvd.	Los Angeles	90045
BMT	Bald Mountain	46811 Ridge Route Road	Gorman	93243
CCB	Compton Court Building	200 W. Compton Blvd.	Compton	90220
CCT	Criminal Courts Building	210 W. Temple Street	Los Angeles	90012
CLM	Claremont	1616 Monte Vista	Claremont	91711
FCCF	LA County Fire Command	1320 N. Eastern Avenue	Los Angeles	90063
CRN	Cerro Negro	Unnamed road – near intersection of Ridge Motorway and Sugar Loaf Dr.	La Cañada Flintridge	91011
HPK	Hauser Peak	Sierra Pelona West Mountainway	Palmdale	93510
HUC	Harbor UCLA	1000 West Carson St.	Torrance	90502
ICC	County Courthouse Inglewood	One Regent St.	Inglewood	90301
LACF028	County FS 28	7733 Greenleaf Avenue	Whittier	90602
LACF077	County FS 77	46833 Peace Valley Road	Gorman	93243
LACF091	County FS 91	2691 S. Turnbull Canyon Road	Hacienda Heights	91745
LACF119	County FS 119	20480 E. Pathfinder Road	Walnut	91789
LACF134	County FS 134	43225 N. 25th St.	Lancaster	93536
LACF136	County FS 136	3650 Bolz Ranch Road	Palmdale	93551
LACF144	County FS 144	31981 Foxfield Drive	Westlake Village	91361
LACF149	County FS 149	31770 Ridge Route	Castaic	91384
LACF157	County FS 157	15921 Spunky Canyon Road	Santa Clarita	91390
LACF164	County FS 164	6301 S. Santa Fe Ave.	Huntington Park	90255
LACF169	County FS 169	5112 N. Peck Road	El Monte	91732
LACF173	County FS 173	9001 S. Crenshaw	Inglewood	90303
LACFDEL	Del Valle Training	28101 Chiquito Canyon Road	Valencia	90731
LASDCSN	Carson	21356 S. Avalon Blvd.	Carson	90745
LASDTEM	L.A. County Sheriff's Station Temple City	8838 E. Las Tunas Drive	Temple City	91780
LBR	Lower Blue Ridge	Angeles National Forest East Blue Ridge Road	Wrightwood	92397
LDWP243	DWP Sylmar Water Ladder	13801 Balboa Blvd.	Los Angeles	91342
MAM	Magic Mountain	Santa Clarita Divide Road	Santa Clarita	91355
MDI	Mount Disappointment	Angeles National Forest Mount Disappointment Road	above La Cañada Flintridge	91011
MIR	Mirador	Glen Oaks Blvd.	Pasadena	91105
MLE	Mount Lee	3800 Mt. Lee Drive	Los Angeles	90068
MLM	Mira Loma Facility	45100 N. 60th West	Lancaster	93536

Table 1.3-1: Statutorily Exempt LMR Sites

Site ID	Site Name	Street Address	City	ZIP Code
MVS	Monte Vista (Star Center)	11515 Colima Road	Whittier	90604
OLI	Olinda	Valencia Avenue	Brea	92823
ONK	Oat Mountain Nike		Chatsworth	91311
PLM	L.A. County Sheriff's Station Palmdale	750 E. Avenue Q	Palmdale	93350
PRG	Portal Ridge	Angeles National Forest	Lake Hughes	93532
PSH	Pomona 1620 Hillcrest	13016 Trail View Lane	Chino Hills	91709
RHT	Rolling Hills Transmit	5741 W. Crestridge Road	Rancho Palos Verdes	90275
WLK	West Lake City Hall	31200 Oak Crest Dr.	Westlake Village	91361

1.4 Organization of the EIR

The Draft EIR is organized as follows:

Section 1 – Introduction: The Introduction provides the project history, background, and summary of the LMR Project; a discussion of the environmental review process; and the scope of the EIR including environmental issues determined not to be significant. It also discusses areas of known controversy. It identifies the responsible and trustee agencies and the intended uses of this EIR

Section 2 – Description of the Project: This section provides a detailed description of the proposed Project and an overview and the Project objectives. Project alternatives are also discussed.

Section 3 – Affected Environment, Environmental Impacts, and Mitigation Measures: This section provides a description of the environmental setting and the applicable regulatory setting for the Project. It identifies the CEQA significance thresholds and includes a project-level impact analysis for each CEQA resource listed in Section 1.3. It also identifies mitigation measures and discusses cumulative impacts for each resource.

Section 4 –Site Summary Forms: This section provides a site-specific environmental impact analysis for each proposed Project site.

Section 5 – Other CEQA Considerations: This section describes the growth-inducing impacts, significant environmental effects of the Project, the mandatory findings of significance, and potential energy impacts of the proposed Project.

Section 6 – Agencies and Persons Contacted: This section lists the people, regulatory agencies, and organizations that were consulted during preparation of this document.

Section 7 –List of Acronyms and Abbreviations.

Section 8 – List of Preparers: This section identifies individuals who were involved in the preparation and/or review of this document.

Section 9 – References.

Appendices

Appendix A – Draft EIR Scoping

A-1 Notice of Preparation

A-2 Initial Study

A-3 Notice of Completion and Distribution List

Appendix B – Technical Studies

B-1 Air Emission Modeling

B-2 Biological Resources

B-3 Noise Modeling

B-4: Cultural Resources Tables

B-4-1: Archaeological Sites within Each Land Mobile Radio Project Site

B-4-2: Architectural Resources

B-4-3: Paleontological Sensitivity within Each Land Mobile Radio Project Site

B-4-4: Tribal Coordination

Appendix C – Construction Best Management Practices

1.5 Areas of Known Controversy

Section 15123 of the CEQA Guidelines requires that an EIR provide a brief summary of areas of controversy known to the lead agency, including issues raised by agencies or the public during the EIR process, and identify ways in which these issues have been or are being resolved. Areas of known controversy are:

- Aesthetics
- Land Use
- Radiofrequency Exposure



Impacts to scenic resources and visual character are a concern to the public. The visual effects of the Project are addressed in Section 3.1, Aesthetics.

Compatibility with local land use planning and zoning is a concern to municipalities. Land use impacts from the Project are addressed in Section 3.9, Land Use.

Potential health issues associated with radiofrequency (RF) exposures from LMR facilities is a concern to the public. RF exposures are addressed in Section 5.3, Radiofrequency Exposures.

Implementation of the mitigation measures for LMR sites selected and approved for construction will be monitored and enforced by the Authority in accordance with CEQA Guidance Section 15097. Specific mechanisms are in place to assure all mitigation measures included in this EIR are implemented and that the provisions are enforceable. A Mitigation Monitoring and Reporting Program is being prepared and includes all mitigation measures and implementation details.

1.6 Responsible and Trustee Agencies

The responsible and trustee agencies for the Project are listed below.

1.6.1 State and Regional

- California Coastal Commission
- California Department of Fish and Wildlife
- California State Historic Preservation Officer
- Antelope Valley Air Quality Management District
- South Coast Air Quality Management District
- Lahontan Regional Water Quality Control Board
- Los Angeles Regional Water Quality Control Board
- Santa Ana Regional Water Quality Control Board

1.6.2 Local Agencies

- | | |
|-------------------------|--------------------------|
| • Los Angeles County | • City of Monterey Park |
| • City of Agoura Hills | • City of Palmdale |
| • City of Beverly Hills | • City of Pasadena |
| • City of Calabasas | • City of San Dimas |
| • City of Cerritos | • City of Santa Monica |
| • City of Chino Hills | • City of Signal Hill |
| • City of Glendale | • City of West Hollywood |

- City of Los Angeles
- City of Malibu
- City of Whittier

1.7 Intended Uses of This EIR

The Authority is the lead agency for the proposed Project, pursuant to CEQA. The intended uses of this EIR include compliance with CEQA and to provide information needed by the Authority Board to make decisions regarding Project approvals and conditions.

This EIR is also intended to support federal, state, and regional and/or local government discretionary approvals that may be required to develop the proposed Project. The agencies and a list of their respective approval authorities are listed below.

1.7.1 Federal Agencies³

- U.S. Fish and Wildlife Service – Compliance with Section 7 of the Federal Endangered Species Act
- U.S. Army Corps of Engineers – Clean Water Act Section 404 compliance.

1.7.2 State Agencies

- California Coastal Commission – Coastal Consistency Determination, Coastal Development permit
- California Department of Fish and Wildlife – State Endangered Species Act consultation: Incidental take authorization/concurrence and compliance with the California Fish and Game Code
- California State Historic Preservation Officer – Consultation under Section 106 of the National Historic Preservation Act
- Antelope Valley Air Quality Management District (AVAQMD) and South Coast Air Quality Management District (SCAQMD) – Compliance with air pollution regulations
- State Water Resources Control Board (SWRCB) – Discharge Requirements: Porter-Cologne Water Quality Act, Clean Water Act Section 401 Water Quality Certification
- Lahontan Regional Water Quality Control Board (RWQCB), Los Angeles RWQCB, and Santa Ana RWQCB– Clean Water Act (CWA) Section 402 National Pollutant Discharge Elimination System (NPDES) Permit; Water Quality Certification; Discharges to Surface Water: Regional General Permits; Report of Waste Discharge/Waste
- California Department of Transportation (Caltrans) – highway encroachment permits

³ Federal land management agencies may not rely on the EIR to approve LMR sites located on federal land and would have to conduct or rely on separate NEPA analysis. LMR sites statutorily exempted from CEQA (see Table 1.3-1) may require additional federal approvals.



- Counties and Cities – conditional use permits (CUP); zone change; Airport Land Use Commission (ALUC) determinations; grading permits; building permits; franchise agreements or licenses; road encroachment permits

Additional permits and agency approvals may be required as the Project moves through the regulatory process.

2.0 Description of the Project

2.1 Proposed Project

2.1.1 Project Overview

The LMR system would consist of sites located primarily in Los Angeles County and in adjacent portions of Orange and San Bernardino counties in southern California that would contain the infrastructure and equipment necessary to provide voice communications coverage throughout the County for emergency responders. The proposed LMR Project would be a modern, integrated wireless voice and narrowband data communications system to serve law enforcement, fire service, health service, and public works professionals throughout Los Angeles County. The new system would provide day-to-day communications within and among agencies and allow seamless interagency communications for responding to routine, emergency, and catastrophic events. The system would be composed of four different subsystems:

- 1) Digital Trunked Voice Radio System – provides first responders with radio communications utilizing digital technology. It seamlessly operates on two bands of spectrum (700 megahertz [MHz] and ultra-high frequency [UHF])
- 2) Analog Conventional Voice Radio System – provides first responders with radio communications utilizing conventional analog technology
- 3) Los Angeles Regional Tactical Communications System – consists of local, state, and federal interoperability channels in four different bands of spectrum in order to allow outside agencies responding to events in the County to have designated channels for communications
- 4) Narrowband Mobile Data Network – a data system that provides critical dispatch communications

2.1.2 Proposed Project Sites

The LMR system would consist of installation and operation of LMR facilities at up to 90 sites; however, the Authority is considering 94 sites to provide alternate site locations if some sites are determined to be unviable and are removed from further consideration during site feasibility assessments, system engineering, geotechnical evaluations, and permitting process or in lease agreement discussions with the property owner. Of these 94 sites, the Authority has previously determined that 40 sites are statutorily exempt from CEQA under PRC section 20180.25, as discussed in Section 1.3.2. This EIR analyzes the remaining 54 sites that do not qualify for the statutory CEQA exemption. The 54 LMR sites evaluated in this EIR are listed in Table 2.1-1 and shown on Figure 2.1-1. Although potential LMR sites are located in Los Angeles County and adjacent portions of Orange and San Bernardino counties, the sites evaluated in this EIR (i.e., the sites not subject to statutory CEQA exemption) are all located within Los Angeles County with the exception of one site in San Bernardino County, as shown in Figure 2.1-1.

Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
AGH	Agoura Hills	Unnamed road – nearest intersection Kimberly Dr.	Agoura Hills	91301	Agoura Hills
AJT	AeroJet	Unnamed road – nearest intersection Woodview Rd.	Chino Hills	91709	Chino Hills
ASD	Auto Square Drive	18605 Studebaker Rd.	Cerritos	90703	Cerritos
BJM	Black Jack Peak	Near Airport Rd.	Santa Catalina Island	90704	Los Angeles County
BUR	Burnt Peak	Angeles National Forest Pine Canyon Rd. to 7N23A	Three Points/Lake Hughes	93532	USFS
BUR1	Burnt Peak – 1	Angeles National Forest Pine Canyon Rd. to 7N23A	Three Points/Lake Hughes	93532	USFS
BUR2	Burnt Peak – 2	Angeles National Forest Pine Canyon Rd. to 7N23A	Three Points/Lake Hughes	93532	USFS
BUR3	Burnt Peak – 3	Angeles National Forest Pine Canyon Rd. to 7N23A	Three Points/Lake Hughes	93532	USFS
CPK	Castro Peak	928 Latigo Canyon Rd.	Malibu	90063	Los Angeles County
DPK	Dakin Peak	Avalon Canyon Rd.	Santa Catalina Island	90704	Los Angeles County
ENC1	Encinal 1 (Fire Camp 13)	1250 S. Encinal Canyon Rd.	Malibu	90265	Los Angeles County
ENT	Entrada Tank Site	21285 W. Entrada Rd.	Topanga	90290	Calabasas
FRP	Frost Peak (Upper Blue Ridge)	Blue Ridge Rd. 3N06	Wrightwood	92397	USFS
FTP	Flint Peak	3600 Linda Vista Rd.	Glendale	91206	Glendale
GMT	Grass Mountain	San Francisquito Rd. to 6N04	Green Valley	91390	USFS
GRM	Green Mountain	Temescal Canyon Fire Rd.	Los Angeles	90272	Los Angeles
H-17A	H-17A	Intersection of Ridge Fire Rd. and Tank Fire E Rd.	Whittier	90601	Whittier
H-69B	H-69B	Unnamed road – nearest intersection West Saddle Peak Rd.	Topanga	91301	Los Angeles County
JOP	Josephine	Angeles Forest Hwy/	Clear Creek/above La	91011	USFS

Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
	Peak	Josephine Peak Road	Cañada Flintridge		
JPK	Johnstone Peak - 1	Angeles National Forest	San Dimas	91741	USFS
JPK2	Johnstone Peak - 2	Sycamore Canyon Rd.	San Dimas	91741	USFS
LACF072	County FS 72	1832 S. Decker Rd.	Malibu	90265	Los Angeles County
LACFCP08	Camp 8	Unnamed road – nearest intersection Rambla Pacifico St.	Malibu	90265	NPS
LACFCP09	County CP 9	21521 N. Sand Canyon Rd.	Santa Clarita	91350	USFS
LACFCP11	County CP 11	8800 W. Soledad Canyon Rd.	Santa Clarita	91350	USFS
LARICSHQ	LA-RICS Headquarters Building	2525 Corporate Place	Monterey Park	91754	Monterey Park
LEPS	Lower Encinal Pump Station	Intersection of Camino De Buena Ventura and Avenida De La Encinal	Malibu	90265	Malibu
LPC	Loop Canyon	Angeles National Forest – off Forest Route 3N17	Santa Clarita	91350	USFS
MMC	Mount McDill	Sierra Pelona West Mountainway	Palmdale	91390	Palmdale
MML	Magic Mountain Link	Santa Clarita Divide Rd.	above Santa Clarita	91387	USFS
MTL2	Mount Lukens-2	5150 Mount Lukens Truck Trail	Los Angeles	91011	USFS
OAT	Oat Mountain-1	Palo Sola Truck Rd.	Chatsworth	91311	Los Angeles County
PASPD01	Pasadena Police Department	214-290 Ramona St.	Pasadena	91101	Pasadena
PDC	Pacific Design Center	8687 Melrose Ave.	West Hollywood	90069	West Hollywood
PHN	Puente Hills	Near Vantage Point Dr.	Rowland Heights	91748	Los Angeles County
PMT	Pine Mountain	Hwy 39 to 2N24	above Azusa	91702	USFS
PWT	Portshhead	5961 S. Cavalleri Rd.	Malibu	90265	NPS

Table 2.1-1: Potential LMR Sites Analyzed in This EIR

Site ID	Site Name	Address			Jurisdiction
		Street	City	Zip Code	
	Tank				
RIH	Rio Hondo	Near Workman Mill Rd.	Whittier	90601	Los Angeles County
SDW	San Dimas	310 Via Blanca	San Dimas	91773	San Dimas
SGH	Signal Hill	2321 Stanley Ave.	Signal Hill	90755	Signal Hill
SIM	Simpsons' Building	Building 42, Fox Lot, 10201 West Pico Blvd.	Los Angeles	90064	Los Angeles County
SPN	Saddle Peak	24574 W. Saddle Peak Rd.	Malibu	90265	Los Angeles County
SUN	Sunset Ridge	Angeles National Forest	above Claremont	91711	USFS
SUN2	Sunset Ridge-2	Angeles National Forest	above Claremont	91711	USFS
TMT	Table Mountain	Hwy 2/Forest Service Rd. 4N21	Wrightwood	92397	USFS
TOP	Topanga Peak	Topanga Tower Mountain Way	Topanga	90290	Los Angeles County
TPK	Tejon Peak	37407 Gorman Post Rd.	Gorman	93243	Los Angeles County
TWR	Tower Peak	Banning House Rd.	Santa Catalina Island	90704	Los Angeles County
VPK	Verdugo Peak-2	Unnamed road - nearest intersection Hostetter Fire Rd.	Glendale	91214	Glendale
WAD	Walker Drive	409 Walker Dr.	Beverly Hills	90210	Beverly Hills
WMP	Whittaker Middle Peak	Whittaker Fire Rd.; Angeles National Forest	Castaic Lake	91384	USFS
WS1	100 Wilshire	100 Wilshire Blvd.	Santa Monica	90401	Santa Monica
WTR	Whittaker Ridge	Whittaker Fire Rd.; Angeles National Forest	Castaic Lake	91384	USFS
ZHQ	Zuma Life Guard HQ	30050 Pacific Coast Highway	Malibu	90265	Malibu

The LMR system was designed to provide voice coverage throughout the Authority's service area, which extends throughout Los Angeles County, with the fewest number of sites possible. Some LMR sites have been proposed outside Los Angeles County at locations with sufficient elevation and clear line of sight to achieve increased coverage within Los Angeles County. Locations were selected within or adjacent to existing communication facilities to the maximum extent feasible. The sites include a variety of types (e.g., water tanks, rooftops, police and fire stations, hospitals, mountain peaks, etc.). Most of these locations have existing communications equipment but do not necessarily have communication towers.

The LMR project would include one or more network operations centers (NOCs) to provide for LMR system monitoring. The NOC would have the capability of assessing equipment performance and remotely or locally managing the equipment and network to prevent degradation or failure of performance. The NOC(s) would operate 24 hours per day, seven days per week. NOC equipment would be installed internally in an existing facility, such as an existing commercial or public safety facility. Each NOC would be equipped with antennas and infrastructure in a configuration similar to that described below for building mount facilities. No ground-disturbing activities are associated with development of the NOCs.

2.1.2.1 Project Site Components

The Authority proposes to install new multiple fiberglass collinear whip antennas (up to 15 feet long), microwave dishes (up to 3 feet in diameter), and new radio equipment at each LMR site. The number of antennas would vary by site. Components common to the LMR sites include:

- the support structure for the antennas, such as a lattice tower, monopole, or building mounts
- an equipment shelter
- an emergency generator

Antennas

The types of antennas that would be installed at LMR sites would depend on the extent of radio coverage, availability in market, operating frequency, and other factors. The primary types are whip antennas and microwave antennas. Whip antennas are used to provide two-way radio communications. These are cylindrical structures designed to provide 360-degree radio signal patterns. They are typically 10 to 15 feet in length. Microwave antennas are parabolic dishes that direct line-of-sight signals between sites and form a network that would provide connectivity to all sites in the LMR project. Microwave antennas typically range from 2 to 6 feet in diameter.

Antenna Support Structures

Four types of antenna support structures may be used:

- Building mount
- Existing lattice tower or monopole

- New monopole
- New lattice tower

Existing lattice towers and monopoles at the proposed LMR sites may be used if the weight and configuration of the proposed whip and microwave antennas are compliant with applicable building codes for structural and seismic stability, if space is sufficient for the new equipment, and if the existing structure can provide the required lines of sight. At LMR sites where a new antenna support structure is proposed, either a new monopole or a new lattice tower, would be constructed.

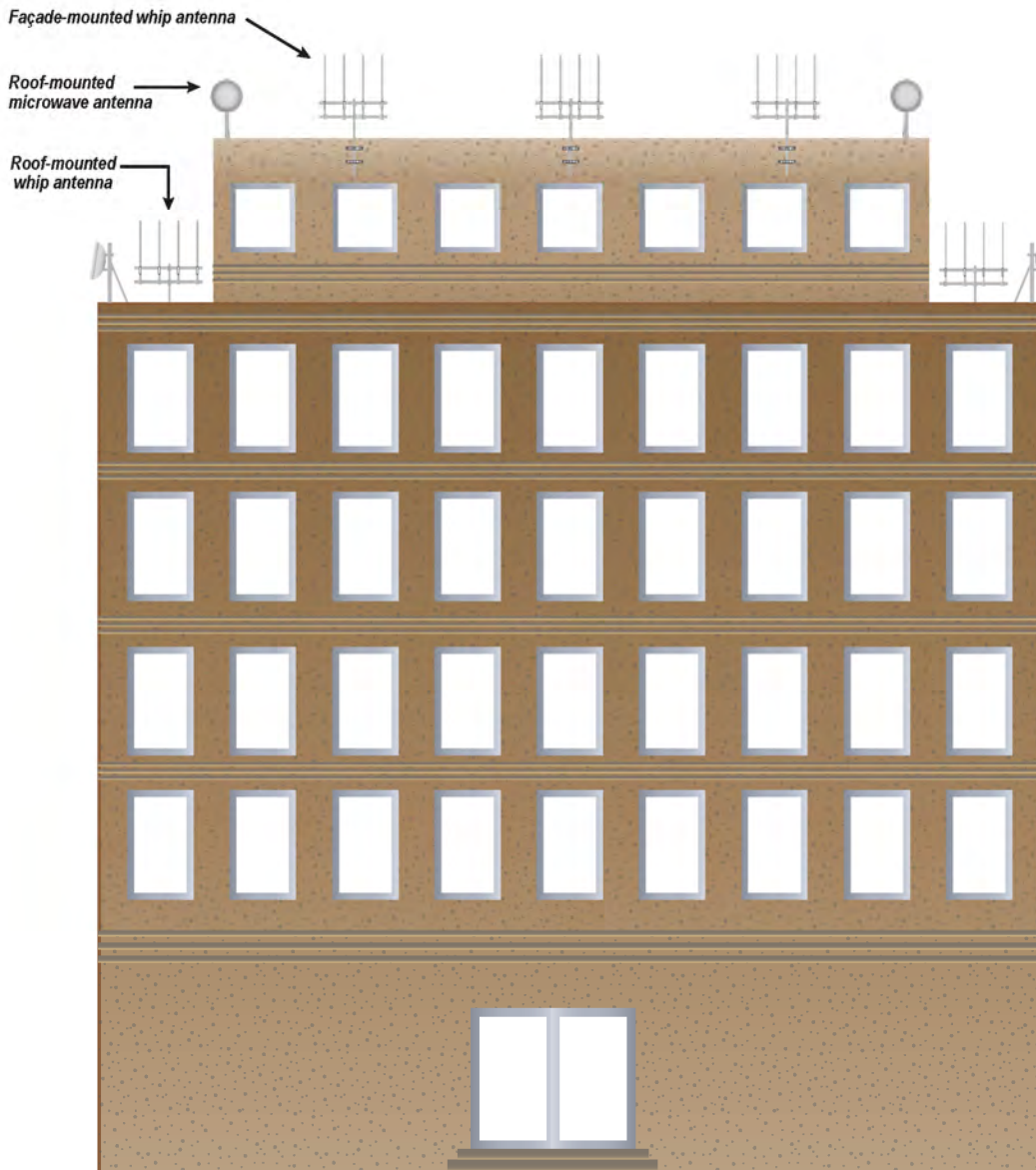
Building Mounts

At a few LMR sites, antennas and ancillary equipment would be installed on existing multi-story buildings. At these sites, antennas would be mounted to a penthouse façade or rooftop. Examples of roof-mounted antennas are shown in Figure 2.1-2.

Existing Lattice Towers or Monopoles

At some LMR sites, equipment would be mounted to existing lattice towers and monopoles (this is referred to as collocation). An additional lightning rod up to 15 feet tall may be installed on the existing lattice tower or monopole to protect the LMR project equipment from lightning strikes. Collocation activities for the LMR project may require modifications to increase the height or strength of existing antenna support structures to allow for installation of additional LMR antennas.

Figure 2.1-2: Typical Roof-Mounted Antenna Installation



New Lattice Towers

New lattice towers would generally be 180 feet in height without appurtenances. Lightning rods up to 15 feet high may be installed on the top of the tower. A typical 180-foot new lattice tower would require installation of a concrete pad up to 50 feet by 50 feet. New lattice towers would be free-standing and would not require use of guy anchors and guyed wires. A typical lattice tower is shown in Figure 2.1-3 and typical site plan for a new lattice tower site is shown in Figure 2.1-4.

New Monopoles

New monopoles would generally be 70 feet in height without appurtenances. Lightning rods up to 15 feet high may be installed on the top of the monopole. Monopoles are free-standing structures with a single footing and would be installed by drilling a caisson. Width of the monopole and depth of the caisson would vary based on monopole height and site conditions. In general, a typical 70-foot monopole would have a diameter at ground level of approximately 6.5 feet and require a caisson at least 36 feet deep. A typical monopole is shown in Figure 2.1-5, and typical site plan for a new monopole site is shown in Figure 2.1-6.

Equipment Shelter

Each LMR site would require installation of new radio communication equipment. At some locations, existing equipment shelters have space to accommodate the new equipment, or an existing shelter would be modified or expanded. At other sites, a new, up to 600-square foot shelter would be required because a shelter does not currently exist or one is present but it does not have sufficient available space to accommodate the LMR equipment. New equipment shelters would either be concrete masonry unit construction (CMU) constructed on site or prefabricated shelters delivered to the site. New shelters would be one or two stories. All new shelters would be installed on concrete pads up to 600 square feet in area and up to 18 inches deep. Shelters would require heating, ventilation, and air conditioning (HVAC) to maintain interior temperature and humidity. Equipment shelters generally would require exterior security lighting equivalent to a 100-watt light bulb. Shelters would have a valve-regulated (sealed) gel cell, or absorbed glass mat type lead-acid battery, or fuel cell battery emergency power system. The shelter roof would be designed so that burning embers will not collect under eaves. All shelters would be constructed in accordance with applicable building codes for each jurisdiction.

Emergency Generators

LMR sites would require backup power. At many sites this would be supplied by a new emergency diesel generator up to 85 kilowatts (kW). An evaluation of existing backup power at all sites would be completed prior to final design and construction. For purposes of impact analysis in this document, it is assumed that each site would include a new emergency generator.

New emergency generators would generally be mounted outdoors on a concrete pad, potentially with curbs. A CMU wall would be installed around most outdoor generators. In some cases, the generator may be installed within its own shelter or building enclosure.

Figure 2.1-3: Typical Lattice Tower Installation

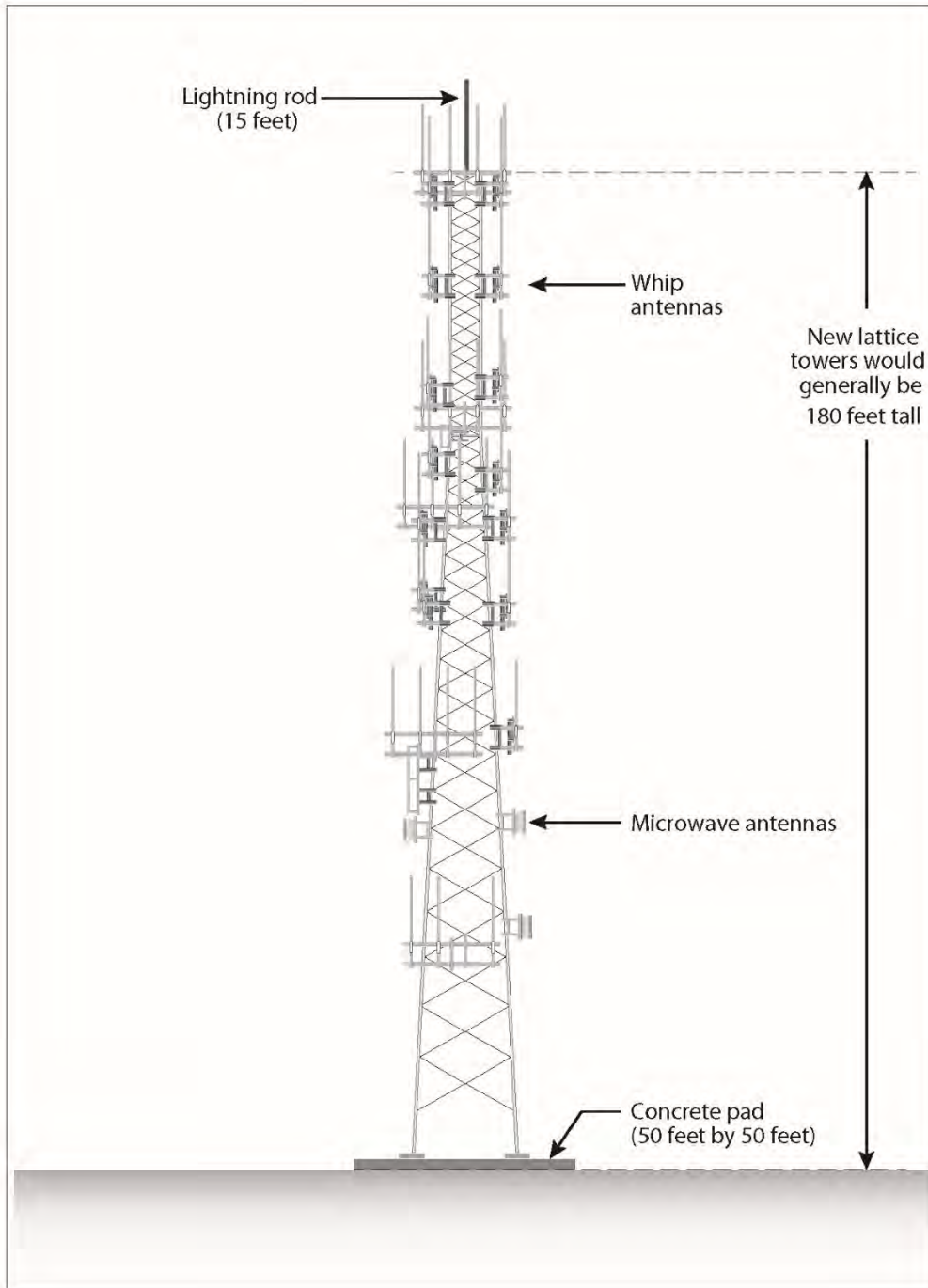


Figure 2.1-4: Typical Site Plan for a New Lattice Tower Site

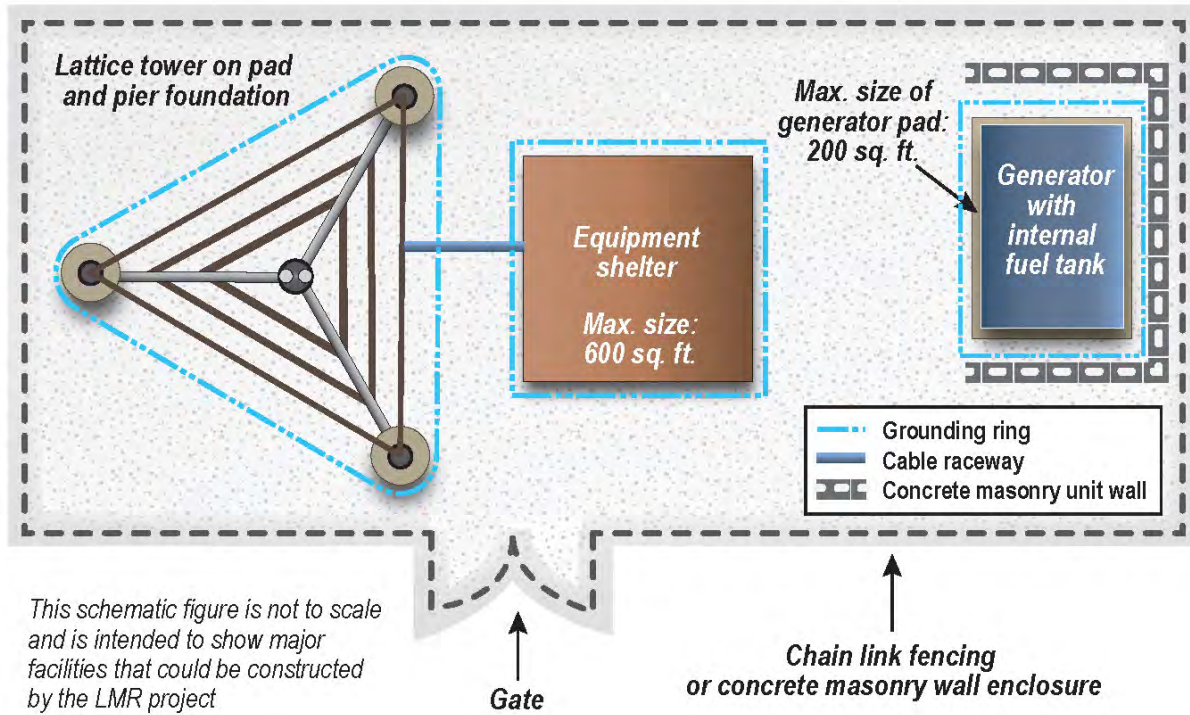


Figure 2.1-5: Typical Monopole Installation

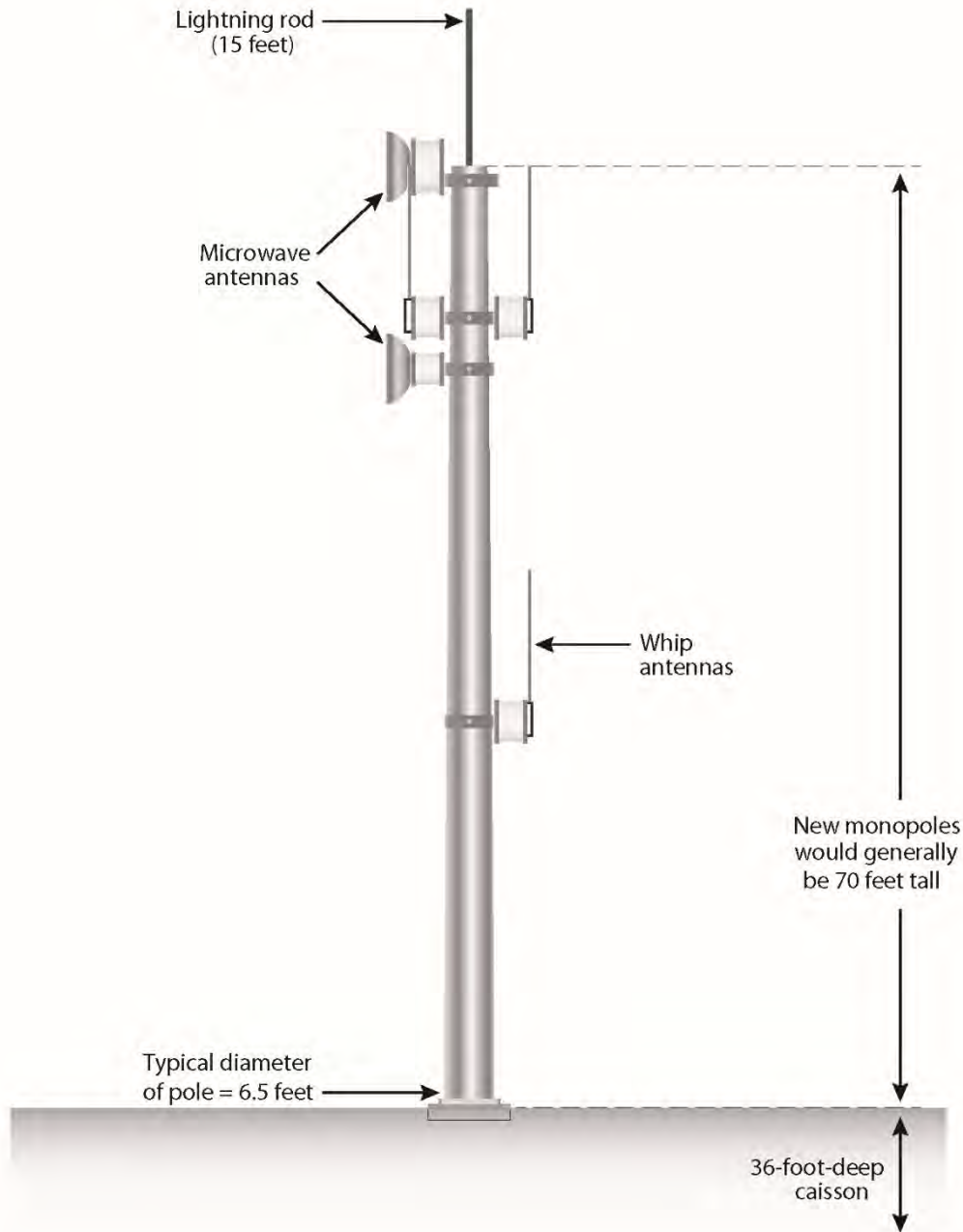
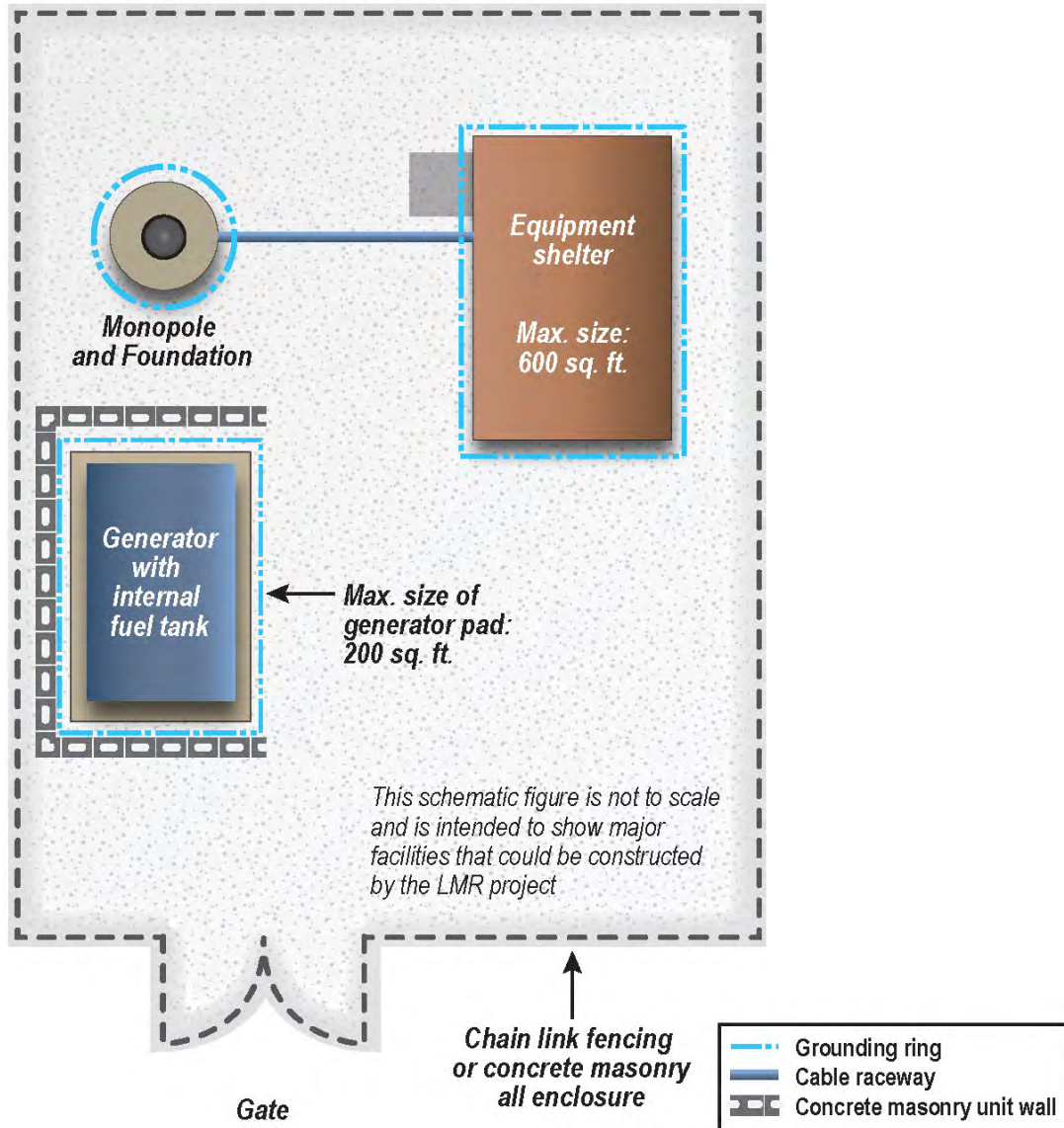


Figure 2.1-6: Typical Monopole Site Plan



New generator foundation sizes would not exceed 200 square feet. Emergency generators would be equipped with spark arrestors and cooling and heating mechanisms. Automatic transfer switches would be installed to accommodate remote monitoring of the system and would allow automatic transfer of power sources in the event of an electrical utility outage and would be capable of being monitored remotely. Generators would have a remote start function. The generators would be fueled by up to 1,500-gallon, double-walled diesel fuel tanks that are integrated into the generator design. All tanks would be constructed in accordance with current codes and standards, and installation would include secondary containment where applicable. Generator fuel tanks would be sized to allow for up to 168 hours of operation at full-rated load at most sites. At dispatch centers, remote sites on mountains, and on Santa Catalina Island, fuel tanks would be sized to provide up to 336 hours of operation. Routine testing of emergency generators would occur during scheduled maintenance of the LMR sites.

Other Components

Grounding

The LMR facilities would require grounding to protect persons and equipment from power surges and lightning strikes. The new constructed structure foundations for the towers or monopoles, equipment shelters, and emergency generators would be surrounded by a subsurface ground ring installed in a trench approximately 30 inches below grade.

Cable Raceway

Communications cables that connect the antennas and the radio equipment in a shelter typically would be routed via an aboveground cable tray supported by steel posts at regular intervals or via underground conduits in a trench typically about 36 inches below grade. The aboveground cable raceway may be covered with a metallic mesh to protect the cables against ice falling from the monopole or lattice tower at locations subject to snow and ice. At proposed sites where antennas would be mounted directly on a building, the antennas would be connected to indoor radio equipment via surface-mounted conduit and the building weatherhead.

Utilities

Electricity is generally available at individual LMR sites. At some sites sufficient electrical power is present on the site. At other sites, power delivery improvements may be required between the LMR facility and the nearest existing interconnection point at a transformer or utility pole off site. Similarly, connection to commercial fiber may be required at urban sites between the LMR facility (the communications equipment within an existing or new shelter or building) and the nearest fiber point of presence or equipment vault. The electrical or fiber connection may be an overhead or an underground line and may extend beyond the perimeter of the telecommunications site. At most sites, underground electrical conduit would be installed between new emergency generators and the equipment shelter. This would occur within the boundary of the communications site. The total amount of trenching required to install electrical conduit (both between the generator and the shelter and between the site and a power source) and to install the communications conduit for fiber connection (between the utility

source and the LMR equipment and between the LMR antennas and the indoor radio equipment), would vary by site but is not expected to exceed 800 linear feet at any site. The electrical and communications underground conduits would be laid in the same trench where the conduit paths coincide, to the greatest extent possible.

At a few remote sites where electrical utilities are not available, solar panels may be installed to provide power. At these sites, new solar arrays of up to 1,500 square feet would be installed to supplement the existing solar arrays.

No other utilities infrastructure would be installed as part of the proposed Project. The LMR sites would not require water or natural gas, and no wastewater would be generated.

Fencing

Some LMR sites may require fencing. LMR facilities may be installed within existing CMU walls or chain link fencing at a site or may require expansion of an existing walled or fenced area or construction of a new walled or fenced area adjacent to an existing enclosure. In a few cases the LMR site may be installed in a new fenced facility near to but not contiguous with an existing fenced facility. Up to 800 linear feet of new chain link fencing or CMU wall up to 12 feet high may be required at a site. In general, new fencing would include swing gates to accommodate access for maintenance vehicles and would enclose an area of 5,000 square feet. Aggregate may be applied to the fenced area of the facility to minimize dust and erosion at the LMR site.

Access

No new roads or off-site improvements are anticipated to be required to access the LMR sites. Some improvements within an LMR site boundary to existing access roads may be required to allow for creation of vehicle turn around and parking areas, as long as these improvements do not result in total permanent disturbance at the site exceeding the disturbance footprint identified in Table 2.1-3. Aggregate may be applied to access roads, turnarounds, and parking areas.

Lighting

The sites would have security lighting. New equipment shelters would generally require exterior security lighting equivalent to a 100-watt light bulb. Where required by the FAA, new antenna support structures would be lighted and/or marked consistent with FAA Advisory Circular, AC 70/7460-1L Obstruction Marking and Lighting, for visibility to aircraft, as applicable, based on proposed structure height and location. FAA lighting is not generally required for towers less than 200 feet in height above ground level; however, lighting for air navigation safety may be required at specific locations for shorter structures, depending on site conditions. If tower obstruction lighting is installed on a tower, it may include red or white light-emitting diode (LED) lamps or strobe lights that are steady and/or flashing.

2.1.2.2 Project Site Types

As described in Section 2.1.2.1, the LMR antennas may be installed on existing or new structures. The sites are described based on the four general types of proposed antenna support structure. These are:

- Building mount
- Existing tower or monopole
- New lattice tower
- New monopole

Table 2.1-2 lists the sites addressed in this EIR by these four general site types. More detailed descriptions of the components proposed at each LMR site are provided in Chapter 4.

Building Mount

Building mount sites would consist of whip and/or microwave antennas mounted to a façade or rooftop. Up to 20 whip antennas and 4 microwave antennas would be installed. Alteration of the building may be required to install the antennas (e.g., structural upgrade to a roof). Indoor equipment racks would be installed within a room in the existing building or in a new shelter either on the building roof or on the ground adjacent to the building. Installation of a new emergency generator is not currently anticipated at any building mount site; however, as noted in Section 2.1.3, it is assumed in this EIR that each site would include a new emergency generator for purposes of impact analysis. If required, a new generator would be constructed on the ground adjacent to the building. Although most construction activities would generally be confined to the building, some ground disturbance may occur adjacent to the building.

Existing Tower or Monopole

These sites are existing telecommunications facilities where LMR antennas would be mounted on an existing lattice tower or monopole. Collocation on these types of existing antenna support structures is proposed for existing telecommunications facilities where space on an existing lattice tower or monopole is sufficient for mounting the LMR antennas, where the weight and configuration of the proposed antennas are compliant with applicable building codes for structural and seismic stability, where radiofrequency (RF) interference would not occur, and where the existing structure can provide the required line(s) of sight. Up to 40 whip antennas and 9 microwave antennas would be installed on an existing tower. Up to 20 whip antennas and 5 microwave antennas would be installed on an existing monopole. Indoor equipment racks would be installed in an existing equipment shelter, or a new shelter would be constructed if the existing shelter cannot accommodate new equipment. A new emergency generator may be required.

New Lattice Tower

New lattice towers could be installed at existing communication facilities but would also be necessary at LMR sites where antenna support structures do not exist or where the current infrastructure is inadequate. Inadequate infrastructure would include existing antenna support structures with insufficient space for installation of LMR equipment, where the weight and configuration of the LMR antennas would not comply with applicable building codes for structural and seismic stability, or where the existing structure does not offer the line(s) of sight. Up to 40 whip antennas and 9 microwave



antennas would be installed on a new lattice tower. The new lattice tower may require flight obstruction lighting that may include red or white light-emitting diode (LED) lamps that are steady and/or flashing. Indoor equipment racks would be installed in an existing equipment shelter, or a new shelter would be constructed. A new emergency generator may be required.

New Monopole

New monopoles are generally proposed for locations such as police or fire stations where an existing lattice tower or monopole is not present; or an existing structure is present but it cannot support the LMR antennas because space is insufficient for installation of LMR equipment, the weight and configuration of the proposed whip and microwave antennas would not comply with applicable building codes for structural and seismic stability, or the existing structure would not provide the required line(s) of sight. Up to 20 whip antennas and 5 microwave antennas would be installed on the monopole. A new monopole may require flight obstruction lighting that may include red or white LED lamps that are steady and/or flashing. Indoor equipment racks would be installed in an existing equipment shelter, or a new shelter would be constructed.

Table 2.1-2: Project Sites by Antenna Support Structure Type

Site ID	Site Name	Site Type				Notes
		Building Mount	Existing Tower or Monopole	New Tower	Lattice New Monopole	
AGH	Agoura Hills				X	New up to 70' monopole
AJT	AeroJet		X			Existing 80' tower
ASD	Auto Square Drive				X	New up to 70' monopole
BJM	Black Jack Peak			X		New up to 180' tower
BUR	Burnt Peak			X		New up to 180' tower
BUR1	Burnt Peak – 1			X		New up to 180' tower
BUR2	Burnt Peak – 2			X		New up to 180' tower
BUR3	Burnt Peak – 3			X		New up to 180' tower
CPK	Castro Peak			X		New up to 180' tower
DPK	Dakin Peak			X		New up to 200' tower
ENC1	Encinal 1 (Fire Camp 13)			X		New up to 180' tower
ENT	Entrada Tank Site				X	New up to 70' monopole
FRP	Frost Peak (Upper Blue Ridge)			X		New up to 180' tower
FTP	Flint Peak			X		New up to 180' tower
GMT	Grass Mountain			X		New up to 180' tower
GRM	Green Mountain			X		New up to 180' tower
H-17A	H-17A			X		New up to 180' tower
H-69B	H-69B			X		New up to 180' tower
JOP	Josephine Peak			X		New up to 180' tower
JPK	Johnstone Peak – 1			X		New up to 180' tower
JPK2	Johnstone Peak – 2			X		New up to 180' tower
LACF072	County FS 72				X	New up to 70' monopole
LACFCP08	Camp 8				X	New up to 70' monopole
LACFCP09	County CP 9				X	New up to 70' monopole
LACFCP11	County CP 11				X	New up to 70' monopole

Table 2.1-2: Project Sites by Antenna Support Structure Type

Site ID	Site Name	Site Type				Notes
		Building Mount	Existing Tower or Monopole	New Tower	Lattice New Monopole	
LARICSHQ	LA-RICS Headquarters Building	X				Existing 30' building
LEPS	Lower Encinal Pump Station				X	New up to 70' monopole
LPC	Loop Canyon				X	New up to 70' monopole
MMC	Mount McDill			X		New up to 180' tower
MML	Magic Mountain Link			X		New up to 180' tower
MTL2	Mount Lukens-2			X		New up to 180' tower
OAT	Oat Mountain-1			X		New up to 180' tower
PASPD01	Pasadena Police Department				X	New up to 70' monopole
PDC	Pacific Design Center	X				Existing 200' building
PHN	Puente Hills			X		New up to 180' tower
PMT	Pine Mountain			X		New up to 180' tower
PWT	Portshead Tank				X	New up to 28' monopole
RIH	Rio Hondo			X		New up to 180' tower
SDW	San Dimas			X		New up to 180' tower
SGH	Signal Hill		X			Existing 160' tower to be extended to 180'
SIM	Simpsons' Building	X				Existing 55' building
SPN	Saddle Peak			X		New up to 180' tower
SUN	Sunset Ridge			X		New up to 180' tower
SUN2	Sunset Ridge-2			X		New up to 180' tower
TMT	Table Mountain			X		New up to 180' tower
TOP	Topanga Peak			X		New up to 180' tower
TPK	Tejon Peak			X		New up to 180' tower
TWR	Tower Peak			X		New up to 180' tower
VPK	Verdugo Peak-2			X		New up to 180' tower

Table 2.1-2: Project Sites by Antenna Support Structure Type

Site ID	Site Name	Site Type				Notes
		Building Mount	Existing Tower or Monopole	New Lattice Tower	New Monopole	
WAD	Walker Drive		X			Existing 120' monopole to be extended to 140'
WMP	Whittaker Middle Peak			X		New up to 180' tower
WS1	100 Wilshire	X				Existing 320' building
WTR	Whittaker Ridge			X		New up to 180' tower
ZHQ	Zuma Life Guard HQ				X	New up to 28' monopole

2.1.3 Construction

Construction at the proposed LMR sites would be phased and would be expected to begin in spring-summer-2016 and be completed in 2017. Construction phasing is based on an average duration of six weeks of construction activity at each LMR site.

Table 2.1-3 summarizes the construction activities associated with the four types of LMR sites. Some sites may result in substantially less disturbance or excavation than the maximum quantities listed in the table, but the analysis assumes maximum disturbance to be conservative.

Table 2.1-3: Anticipated Construction Activities by Site Type

Disturbance Type	Building Mount	Existing Tower or Monopole	New Lattice Tower	New Monopole
Temporary Disturbance (includes staging) ¹	Temporary disturbance area (includes staging on adjacent ground level): Up to 5,000 square feet	Temporary disturbance area (includes staging): Up to 5,000 square feet	Temporary disturbance area (includes staging): Up to 5,000 square feet	Temporary disturbance area (includes staging): Up to 5,000 square feet
Permanent Disturbance	Permanent disturbance area: Up to 3,000 square feet at ground level	Permanent disturbance area: Up to 2,000 square feet	Permanent disturbance area: Up to 4,000 square feet	Permanent disturbance area: Up to 3,000 square feet
Excavation (including geotechnical investigation)	Excavation: Up to 100 cubic yards removed	Excavation: Up to 100 cubic yards removed	Excavation: Up to 600 cubic yards removed	Excavation: Up to 150 cubic yards removed
Trenching	Proposed trenching for underground conduits to accommodate power and/or fiber not to exceed 800 linear feet, up to 48 inches below grade, up to 24 inches wide	Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet, up to 48 inches below grade, up to 24 inches wide.	Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet, up to 48 inches below grade, up to 24 inches wide.	Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet, up to 48 inches below grade, up to 24 inches wide.
Foundation Construction	Proposed foundations include: Up to 600-square foot by 18-inch concrete slab, or raised foundation for equipment shelter Up to 200-square foot by 18-inch concrete slab for generator	Proposed foundations include: Up to 600-square foot by 18-inch concrete slab, or raised foundation for equipment shelter Up to 200-square foot by 18-inch concrete slab for generator	Proposed foundations include: Up to 50-foot by 50-foot by 5-foot concrete slab with up to 10-foot deep by 3-foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6-foot diameter by up to 70-foot deep concrete piers under each	Proposed foundations include: Up to 8-foot diameter by 36-foot deep drilled caisson with concrete cap for monopole support; or up to 16-foot by 16-foot by 10-foot deep concrete mat foundation Up to 600-square foot by 18-inch concrete

Table 2.1-3: Anticipated Construction Activities by Site Type

Disturbance Type	Building Mount	Existing Tower or Monopole	New Lattice Tower	New Monopole
			leg Up to 600-square foot by 18-inch concrete slab, or raised foundation for equipment shelter Up to 200-square foot by 18-inch concrete slab for generator	slab, or raised foundation for equipment shelter Up to 200-square foot by 18-inch concrete slab for generator
Demolition	Demolition of existing pavement and/or structures associated with features such as extensions of power on the ground	Demolition of existing pavement and/or structures	Demolition of existing pavement and/or structures	Demolition of existing pavement and/or structures

¹ At locations where solar power is required, solar panels would be installed and disturbance may be up to 10,000 square feet.

Estimates of construction equipment and duration of use at each LMR site are described in Table 2.1-4, Project Site Construction Equipment Usage. Some equipment may not be needed for each LMR site and would depend on the type of construction activity needed.

Table 2.1-4: Project Site Construction Equipment Usage

Equipment Type	Specification (Brake Horsepower)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Personnel and Tool Delivery						
F250 Antenna and Line Truck	306	4	0.067	120	30	Haul equipment
F550 Civil Truck	306	1	0.067	30	30	Haul personnel
Demolition³						
Concrete Saw ²	81[27] ²	1	7	1	1	Break up existing concrete
Mini Excavator	22.9	1	4	1	1	Cut and fill work
Dump Truck	450	1	8	1	1	Haul off excess material
2,000 Gallon Water Truck	210	1	1	1	1	Dust control
Site Preparation						
Mini Excavator	22.9	1	4	1	15	Cut and fill work
Excavation³						
Auger Drill Rig ²	205 [206] ²	1	3	1	2	Install fences, excavate foundation holes and bores
Excavator ¹	153	1	5	1	10	Trenching

Table 2.1-4: Project Site Construction Equipment Usage

Equipment Type	Specification (Brake Horsepower)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Cat Skid Steer	73	1	4	1	10	Move excavated soil on site
2,000 Gallon Water Truck	210	1	1	3	10	Dust control
Pad Construction³						
Concrete Truck	450	1	1	19	19	Pour concrete
Monopole/Shelter/Tower and Equipment Installation³						
3-Ton Flatbed Truck	400	1	3	1	2	Haul materials and equipment
250-Ton Crane	530	1	8	2	4	Monopole/shelter installation, tower assembly
8,000 Pound Reach Fork	60	1	4	2	5	Access structures, string conductor, modify structure arms, tree trimming/ removal, etc.
Portable Generator ²	84 [7] ²	1	6	1	10	Operate power tools
¹ Maximum six week total construction duration. ² Horsepower and usage data referenced from <i>Broadband Technology Opportunities Program Final Environmental Assessment, Los Angeles Regional Interoperable Communications System LTE System (LA-RICS LTE, 2008)</i> . ³ Building Mount and Existing Lattice Tower and Monopole site types would not require all equipment and/or phase.						

Typical construction equipment required would include four-wheel drive vehicles, antenna and line trucks, water trucks, excavators, skidsters, cranes, forklifts, dump trucks, and concrete trucks. Almost all LMR facilities would be constructed within or adjacent to existing telecommunications or other facilities, such as water tanks, or at developed locations that currently have public radio service such as police and fire stations. At facilities such as urban police and fire stations, LMR construction may occur within paved or landscaped areas of the facility property.

Each site would undergo a Phase I hazardous materials assessment prior to construction. If feasible, hazards would be abated prior to initiation of construction. If abatement is infeasible, the site would be eliminated from the proposed system. Geotechnical investigation is a site-specific scientific investigation of soil properties and local geology during project design and would occur prior to project construction activities, primarily at sites where construction of new lattice towers or new monopoles is proposed. Geotechnical investigation would help to verify that foundations designed for the proposed LMR infrastructure comply with applicable building safety codes and system reliability requirements. Minimal ground disturbance is associated with geotechnical investigation activity, which involves drilling an up to 8-inch-diameter hole up to 100 feet deep to allow sampling of a minimal amount of soil for laboratory analysis to determine soil types and properties. The drilled hole would be reinstated and backfilled with bentonite (a soil-concrete mix) to the level of the surrounding surface after soil samples have been taken. Geotechnical investigation would involve use of a drill rig; an additional truck; and, potentially, a

water truck. All geotechnical investigation work at a site would take less than one day. Geotechnical investigation is part of the design phase of the project and would occur well ahead of construction activities. Foundation and soil work would conform to the geotechnical report recommendations.

Construction activities at each site would result in temporary disturbance of a maximum of approximately 5,000 square feet (0.11 acre) of ground surface, except at sites that require installation of solar arrays for power. At these sites, the disturbance footprint may be up to 10,000 square feet (0.23 acre). At sites that require the most new construction (i.e., locations that require installation of new concrete pads for a tower, shelter, and generator), a maximum of approximately 4,000 square feet (0.1 acre) of new impermeable surface would be created. At sites constructed at locations that are currently paved (e.g., at an urban police station parking area), any increase in impermeable surface would be minimal.

The project site would be graded so that water drains away from structures. A minimum of a 2-percent grade would be provided. After completion of construction and grading, the facility sites would be covered in aggregate (gravel) from a permitted local source. Where existing surface cover, such as asphalt, concrete, or gravel is disturbed or removed during construction, the ground surface would be repaired, patched, and reinstated. Areas disturbed during construction that are not to be permanently covered by aggregate would be seeded for erosion prevention.

Excavated material of suitable quality could be used as backfill or fill on site. Unsuitable or excess excavated material would be removed for disposal off site at an appropriate facility.

Site construction may require removal of existing paved surfaces, fencing, towers, and shelters to allow for installation of the LMR facilities. Demolition materials would be reused or recycled to the extent practicable or otherwise properly disposed of.

Included in the proposed Project design are best management practices (BMPs) that have been developed to avoid or minimize impacts to environmental resources that may be present on some potential LMR sites. BMPs represent best professional practices and/or use of accepted technology to ensure desired regulatory compliance is achieved and are often included in building permits, which would be required for all site types, or other regulatory conditions. Examples of BMPs applicable to the proposed Project are provided below. A complete list of BMPs considered in this analysis is presented in Appendix C.

Examples of BMPs applicable to the proposed Project include:

- Apply water to the construction site as needed to comply with Rule 403 of the applicable air quality management district.
- Enclose or water down exposed dirt storage piles.
- Minimize the disturbed area and preserve vegetation to the maximum extent possible.

- Phase construction activities, to the extent possible, to reduce disturbed areas and time of exposure.
- Plan the development to fit the topography, soils, drainage pattern, and natural vegetation of the site.
- Delineate clearing limits, easements, setbacks, sensitive or critical areas, trees, drainage courses, and buffer zones to prevent excessive or unnecessary disturbances and exposure. Minimize the size of staging areas to the extent practical.
- Avoid excavation and grading during wet weather.
- Use berms and drainage ditches to divert runoff around exposed areas. Place diversion ditches across the top of cut slopes.
- Control stormwater flowing to and through the project site.
- Protect slopes by using measures such as erosion control blankets, bonded fiber matrices, turf reinforcement mats, silt fences (for moderate slopes), etc.
- Temporarily protect storm drain inlets until the site is stabilized. Protect drainage courses, creeks, or catch basins with fiber rolls, silt fences, sand/gravel bags, and/or temporary drainage swales if on-site sediment control measures are not adequately preventing stormwater runoff.
- Use appropriate erosion control measures to reduce siltation and runoff of contaminants into wetlands and adjacent ponds, streams, or riparian woodland/scrub.
- Conduct routine inspections of erosion control measures especially before and immediately after rainstorms, and repair if necessary.
- Establish stabilized construction entrances/exits (e.g., large crushed rocks, stone pads, steel wash racks, hose-down systems, and pads).
- Clean up leaks, drips, and other spills immediately to avoid soil or groundwater contamination. Cleanup of a spill on soil would include removing the contaminated soil using the emergency spill cleanup gear. Contaminated soil and disposable gear used to clean up a hazardous materials spill would be properly disposed of following state and federal hazardous material disposal regulations.

2.1.4 Operations and Maintenance

Prior to becoming operational, the LMR system would undergo systems acceptance testing before it is made available to the LA-RICS users. Systems acceptance testing would be conducted after most construction at the LMR sites is complete. LMR system acceptance is anticipated to occur prior to the end of 2018.

No staff would be required at any of the sites to operate the LMR equipment, except at the NOCs, which would be embedded within an existing staffed facility. Operational activities at individual LMR sites would include routine inspections, maintenance, and repairs.

Maintenance activities would involve both routine preventive maintenance and emergency procedure testing, including emergency generator testing, to maintain service continuity. Emergency generators would be tested on a monthly basis. The test run time each month would be approximately one hour. Fuel tanks in the emergency generators would require occasional refilling. LMR structures and equipment would be inspected annually, at a minimum, for corrosion, equipment misalignment, loose fittings, and other common mechanical problems. Maintenance activities may require use of bucket trucks (man-lifts), standard vans, or utility pickup trucks, depending on the scope of maintenance. The LMR components may need to be repaired or replaced to maintain uniform, adequate, safe, and reliable service. Equipment replacement or repair that cannot be diagnosed and performed remotely may require a technician on site, typically in a standard van or utility pickup truck. Where replacement or repair involves installed antennas, a four-person crew with one truck, a boom (aerial lift) truck, and an assist van or sport utility vehicle (SUV) might be required.

Each LMR site would continually draw power for LMR operations and security and safety lighting (including that required by FAA).

As part of site development and maintenance, vegetation on or immediately adjacent to an LMR site would be removed, as needed, in accordance with plans or procedures applicable to the site (i.e., jurisdictional requirements; type of infrastructure to be protected; and site factors including vegetation type, slope, and aspect).

2.2 Project Objectives

The Los Angeles region is designated as a high-threat area by the Department of Homeland Security (DHS). The proposed LMR system would provide emergency responders with an improved communications system for an efficient and coordinated response to incidents and emergencies that presently is not possible in Los Angeles County.

Effective radio communication is critical in helping police officers prevent and respond to crimes, keeping firefighters safe as they fight blazes, facilitating life-saving exchanges of information between emergency medical service professionals and hospitals, and allowing public works and utility providers the opportunity to coordinate responses to disasters and special events. LMR would support a rapid, safe, and effective response during daily operations. Additionally, it would support a faster, better-coordinated, large-scale response to emergencies such as wildfires, earthquakes, civil disturbance, or other disasters. It would replace the existing aging patchwork of LMR systems with a single county-wide network and would improve overall system capacity and coverage for first and second responders region-wide.

In addition, most public safety entities currently use a portion the radiofrequency spectrum (UHF T-Band frequency spectrum at 470 to 512 MHz) that the FCC has mandated be vacated by 2023. The proposed LMR system would allow for phase-out of use of the UHF T-Band and transition to the use of the 700-MHz spectrums.

The objectives of the LMR Project are:

- 1) Provide day-to-day voice and narrowband data radio communications for first and second emergency responders in the Los Angeles region
- 2) Enable interoperability among member agencies and mutual aid providers
- 3) Support communication with regional, state, and federal agencies in the event of a natural or man-made disaster
- 4) Improve emergency communications within Los Angeles County
- 5) Add capacity, replace existing aging infrastructure with infrastructure that meets current building codes and telecommunications industry standards that better support modern technology, and provide for more technologically advanced equipment
- 6) Lessen the amount of interference resulting from multiple systems on the same tower by providing greater separation of different radio frequencies
- 7) Provide greater frequency flexibility and increase overall system coverage and capacity by providing greater separation of different radio frequencies
- 8) Allow for transition from use of the UHF T-Band to the 700 MHz spectrum as mandated by the FCC

2.3 Project Alternatives

As discussed in Section 2.1.2, the LMR Project consists of the construction and operation of up to 90 LMR sites out of 94 sites under consideration. These 90 sites may be a combination of sites previously found statutorily exempt from CEQA (see Section 1.3.2) and sites addressed in this EIR as the proposed Project (see Section 2.1.2).

By considering more sites than would ultimately be constructed, the Authority is effectively considering numerous alternative locations for the proposed Project. The ultimate selection of which sites will be constructed will be determined based on the conclusions of the Draft EIR, as well as whether some of the 94 potentially feasible sites ultimately prove infeasible due to economic, environmental, legal, social, or technological factors, including system engineering, geotechnical evaluations, and permitting process or in lease agreement discussions with the property owner.

Listed below are the groups of two or more proposed Project sites analyzed in this EIR that would be alternatives to each other. Out of the sites in each group below only one site would be constructed.

Sites BUR, BUR1, BUR2, BUR3, and BUR 4

These sites are alternate locations within the same telecommunications site complex in the Angeles National Forest.

Sites ENT, LACFCP08, and TOP

These sites are located in the Santa Monica Mountains and each would provide similar coverage.

Sites FRP and TMT

Sites FRP and TMT are both within Angeles National Forest. Site FRP is south of Highway 2 and Site TMT is north of Highway 2.

Sites LACFCP09 and LPC

Sites LACFCP09 and LPC are both within Angeles National Forest and about 0.25 mile apart from one another.

Sites H-69B and SPN

These sites are located in the Santa Monica Mountains and each would provide similar coverage.

Sites JPK and JPK2

Sites JPK and JPK2 are alternate locations within the same telecommunications site complex in the Angeles National Forest.

Sites SUN and SUN2

Sites SUN and SUN2 are alternate locations within the same telecommunications site complex in the Angeles National Forest.

2.4 No Project Alternative

Under the No Project Alternative, none of the LMR wireless voice and narrowband data communications system sites that are the subject of this EIR would be constructed; however, the existing facilities at the communication sites identified for LMR use in this EIR would continue to be inspected, maintained, and repaired as part of ongoing activities.

The No Project Alternative is analyzed in this document in compliance with CEQA. The No Project alternative represents the anticipated conditions if construction and operation of the proposed Project were not implemented.

2.5 Environmentally Superior Alternative

Based on the analysis in this Draft EIR, the “environmentally superior alternative”, as that term is used in CEQA, is the No Project Alternative. If, as here, the environmentally superior alternative is the No Project Alternative, CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative among the other alternatives.

As discussed previously, the Draft EIR analyzes more sites than would be constructed. Listed below are the groups of two or more proposed Project sites analyzed in this EIR that would be alternatives to each other. Out of the sites in each group below only one site would be constructed. Table ES-1 in the Executive Summary, which presents a summary of the environmental impacts by site, lists these alternate sites next to each other and groups them by a heavy line to allow easy comparison of the

environmental impacts among them. These groups of sites are listed below with the environmentally superior alternative in each group identified.

Sites BUR, BUR1, BUR2, BUR3, and BUR 4

These sites are alternate locations within the same telecommunications site complex in the Angeles National Forest. As summarized in Table ES-1, environmental impacts at each of these sites would be similar, and no one site is environmentally superior to the others.

Sites ENT, LACFCP08, and TOP

At Site LACFCP08 significant and unavoidable impacts would occur to cultural resources. Selection of either Site ENT or Site TOP would avoid these significant and unavoidable impacts and would not result in any other significant and unavoidable impacts. As summarized in Table ES-1, impacts at Sites ENT and TOP would be similar. While there would be no impacts at either site that could not be reduced to less than significant with mitigation, Site TOP would require more mitigation measures for biological and cultural resources than Site ENT to reduce impacts to less than significant. Therefore Site ENT is considered the environmentally superior site.

Sites FRP and TMT

Sites FRP and TMT are both within Angeles National Forest. Site FRP is south of Highway 2 and Site TMT is north of Highway 2, but the settings are relatively similar. As summarized in Table ES-1, there is no distinction between the two sites in terms of anticipated environmental impacts. Neither is environmentally superior to the other.

Sites LACFCP09 and LPC

Sites LACFCP09 and LPC are both within Angeles National Forest and about 0.25 mile apart from one another. Significant and unavoidable impacts to cultural resources would occur at both sites. The environmental impacts of the two sites are similar for most resources. While environmental impacts at the two sites would be similar, impacts to biological resources and geology and soils would be slightly greater at Site LPC; therefore Site LACFCP09 is considered the environmentally superior site.

Sites H-69B and SPN

Site H-69B is on an undeveloped ridgeline. Significant and unavoidable impacts would occur at site H-69B to aesthetics and cultural resources. Selection of Site SPN would avoid these significant and unavoidable impacts and would not result in any other significant and unavoidable impacts; therefore, Site SPN is the environmentally superior alternative.

Sites JPK and JPK2

These sites are alternate locations within the same telecommunications site complex in the Angeles National Forest. As summarized in Table ES-1, environmental impacts at each of these sites would be similar, and neither site is environmentally superior to the other.

Sites SUN and SUN2

These sites are alternate locations within the same telecommunications site complex in the Angeles National Forest. As summarized in Table ES-1, environmental impacts at each of these sites would be similar, and neither site is environmentally superior to the other.

2.6 Alternatives Considered and Eliminated from Further Consideration

The following alternatives to the Project were eliminated from further consideration in this EIR because they are infeasible. In accordance with CEQA Guidelines Section 15126.6, an EIR is not required to consider alternatives that are infeasible.

2.6.1 Collocation

This alternative would consist of limiting installation of LMR antennas to existing structures, including roof tops, monopoles, and towers, i.e., “collocation.” Where feasible to support system performance and reduce the number of sites, the Authority included site design documentation and plans to support collocation and/or utilization of existing telecom tower/sites; however, installing the LMR antennas on existing structures is not possible at each potential LMR site. LMR sites were identified at locations that would provide the maximum countywide coverage using the minimum number of sites. Existing structures for mounting LMR antennas are not present at all locations that are required to achieve countywide coverage. At some locations where towers are present, space is not sufficient on the existing tower to mount the LMR antennas. Therefore, construction of new lattice towers and monopoles would be required to complete the LMR system. Limiting the LMR locations to only those where collocation is possible would not provide the desired coverage; therefore, an alternative consisting entirely of collocation sites would not meet the Project objectives and was not considered further.

2.6.2 Use of Cell on Wheels

Cell on Wheels (COW) are mobile, portable cell towers with self-contained equipment and generators. COWs are not tall enough to provide the required line of sight at most LMR sites, especially those where new lattice towers are proposed. Although they are comparable in height to many of the monopoles proposed for various LMR sites, most of which would be 70 feet tall, COWs are not large enough to support all the antennas required at LMR sites. Therefore, use of COWs, either for all sites or even at only a few sites, would not meet the Project objectives and was not considered further.

2.6.3 Use of Satellites

LMR communication could be conducted by using a satellite system. However, satellite systems experience a significant lag time between sender and receiver that does not allow the quick communication required during an emergency response. Therefore, use of a satellite system would not meet Project objectives and was not considered further.

2.6.4 Alternative Systems

As the governing board for the LA-RICS telecommunications system, the Authority reviewed various telecommunications options and worked with industry experts to modernize their systems, and ease transition from the existing network to a hybrid of digital and analog networks to provide a mobile data system. In November 2011, requests for proposals were developed to support the hybrid system. In January 2012, proposals were received and a vendor was chosen. Alternative systems to the hybrid system were not identified.

2.7 Projects Considered for Cumulative Impacts Analysis

In accordance with CEQA Guidelines §15130, this EIR presents an analysis of cumulative impacts that may result from construction and operation of the proposed Project. As defined in CEQA Guidelines §15355, cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

This EIR addresses 54 potential LMR sites (see Table 2.1-1). Together with the sites previously found to be statutorily exempt from CEQA (listed in Section 1.3.2), this accounts for 94 potential LMR sites, of which up to 90 may be selected for construction and operation. While not all of the statutorily exempt sites may be constructed, the analysis of cumulative impacts considers potential for cumulative impacts associated with the statutorily exempt LMR sites.

The analysis of cumulative impacts also considers the potential for cumulative impacts associated with the LTE system. As discussed in Section 1.1.3.1, the LTE system is a separate project being carried out by the LA-RICS Authority. The LTE system comprises 77 sites, some of which are “collocation” sites (i.e., sites where LTE infrastructure has been collocated on existing towers or other structures), some of which include new monopoles (up to 70 feet in height), and some of which are COW sites. Construction of LTE sites began in December 2014 and was completed in December 2015.

In addition to LMR facilities and LTE facilities, other types of past, current, and reasonably foreseeable projects may contribute to the types of effects that would result from construction and operation of the proposed Project sites. These include other wireless communications structures and transmission lines, as well as other types of projects that could have similar impacts.

A list of projects for consideration for cumulative impact analysis is provided in Table 2.7-1. This list was developed through a review of active projects identified from the FCC Antenna Structure Registration, California Public Utilities Commission, California Energy Commission, the Desert Renewable Energy Conservation Plan websites, and from county and city websites, and from city planning department personnel. A cumulative impact analysis is provided for each of the resource topics analyzed in Chapter 3.0. Table 2.7-1 lists projects identified within 2 miles of the proposed Project sites; however, the cumulative impact analysis for each resource in Chapter 3 considers projects within a distance of each proposed Project site that is appropriate for the resource. For some resources use of a summary of



projections, rather than a list of projects, is more appropriate for assessing cumulative impacts. The applicable approach is described in the cumulative impact analysis for each resource section.

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
AGH	1.89	9,998	LA-RICS: WLK	31200 Oak Crest Dr.	Westlake Village	LA-RICS LMR: STATEX 12/17/2015		
	1.91	10,078	Westlake Village Business Park Specific Plan	5521 Lindero Canyon Rd.	Westlake Village	redevelopment of an existing business park	Env. Review: EIR	
	1.23	6,516	North Ranch Gateway Center renovation	30819 E. Thousand Oaks Blvd.	Westlake Village	landscaping and cosmetic renovations		under construction
	1.59	8,383	Equine Estats c/o Fortune Realty	Cheseboro Canyon Dr.	Oak Park	Subdivide lots, construct road & drainage facilities and trails	Env. Review: EIR	in review
	1.09	5,745	Michael Allan	6055 Hackers Ln.	Agoura Hills	add to an existing single-family residence	Env. Review: Catex	approved
	1.96	10,374	Luke and Hayley Texidor	28400 Renee Dr.	Agoura Hills	new single-family residence + garage	Env. Review: Catex	approved
	1.96	10,348	Manny Montes	5427 Colodny Dr.	Agoura Hills	addition to main house + new garage & rec room	Env. Review: Catex	approved
	1.96	10,347	Arc Design Group, Inc.	28080 Balkins Dr.	Agoura Hills	new single-family residence + garage	Env. Review: Catex	approved
	1.90	10,018	Brent Schneider for Zahavi	6021 Colodny Dr.	Agoura Hills	new single-family residence	Env. Review: Catex	approved
	1.57	8,282	Daniel Farkash for Heather Danko	28414 Foothill Dr.	Agoura Hills	remodel & room addition	Env. Review: Catex	approved
	1.95	10,294	Lucian T. Hood for Steven & Katy Rishoff	5411 Colodny Dr.	Agoura Hills	remodel & room addition & garage	Env. Review: Catex	approved
	1.98	10,440	Katherine Neff	28445 Lewis Pl.	Agoura Hills	new single-family residence + garage		in review
	1.53	8,060	Jose Fulginiti/Toba Properties	28443 Foothill Dr.	Agoura Hills	new single-family residence + garage	Env. Review: Catex	in review
	1.69	8,949	Jay Rogers	28423 Waring Pl.	Agoura Hills	18 single-family residential unit subdivision (zone change)	Env. Review: Undetermined	in review
	1.54	8,150	Shahnaz Bridette Bina	6000 Lapworth Dr.	Agoura Hills	4,374 sf new single-family residence & 575 sf garage	Env. Review: Catex	in review
	1.57	8,302	Vineet and Ona Annette Sharma	5952 Lapworth Dr.	Agoura Hills	4,712 sf new single-family residence & 692 sf garage	Env. Review: Catex	in review
	1.55	8,194	Carlos Khantzis & Steve Rice	30800 Agoura Rd.	Agoura Hills	Condo units, recreation center, parking (104,138 sf)	Env. Review: MND	in review
	1.20	6,338	Symphony Development	29214 Agoura Rd.	Agoura Hills	Subdivide into 8 lots	Env. Review: Catex	approved
0.32	1,686	Crown Castle	5700 Ironwood Dr.	Agoura Hills	Install DA antenna atop Edison street light pole	Env. Review: Catex	approved	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.54	2,871	Crown Castle	5460 Forest Cove Ln	Agoura Hills	Install DA antenna atop traffic signal pole	Env. Review: Catex	approved
	0.91	4,796	Crown Castle	5427 Kanan Rd.	Agoura Hills	Install DA antenna atop traffic signal pole	Env. Review: Catex	approved
	1.15	6,047	El Pollo Loco	5050 Kanan Rd.	Agoura Hills	exterior remodel w/ signage (3,592 sf)	Env. Review: Catex	approved
	1.06	5,602	PDC for AT&T	30105 Agoura Rd.	Agoura Hills	Upgrade wireless telecommunication facility	Env. Review: Catex	approved
	1.40	7,381	Whizin Market Square, LLC/Tucker Investment Group, LLC	28914 Roadside Dr.	Agoura Hills	Sign Program Amendment	Env. Review: Catex	approved
	1.59	8,414	Ware Malcomb for Agoura Business Center West, LLC (William Poe)	28601 Canwood St.	Agoura Hills	change site from Bus. Manufacturing to Comm. Retail (3 new retail buildings 21,782 sf)	Env. Review: MND	approved
	1.50	7,928	Shirvanian Family Investment (New ABC North)	28700 Canwood St.	Agoura Hills	Industrial park w/ 7 buildings (103,000 sf)	Env. Review: MND	approved
	1.40	7,381	William Tucker	28914 Roadside Dr.	Agoura Hills	new sign program for Whizen Market Square		in review
	0.96	5,074	Martin Teitelbaum for Agoura Landmark	29621 Agoura Rd.	Agoura Hills	build 6 industrial buildings on vacant parcel (72,230 sf)		in review
	1.00	5,261	Synergy Development Services for T-Mobile	29646 Agoura Rd.	Agoura Hills	Modify antennas & equipment at existing wireless facility		in review
	1.12	5,919	Core Communications for Verizon	30100 Agoura Rd.	Agoura Hills	Modify antennas & equipment at existing wireless facility		in review
	1.37	7,240	Mike Peters for Tucker Development	28912 Roadside Dr.	Agoura Hills	Remodel of Whizen Market & parking lot improvements		in review
	1.04	5,508	Selleck Development Group	29431 & 29439 Agoura Rd.	Agoura Hills	Build gym & restaurant (45,000 sf & 4,000 sf) & merge parcels	Env. Review: IS/MND	in review
	1.46	7,727	Utopia Hills by Alon Zakoot	Agoura Rd.	Agoura Hills	Mixed-use and live/work (44,668 sf restaurant, residential)	Env. Review: Pending	in review
	1.17	6,161	Owen Nostrant	29130 Roadside Dr.	Agoura Hills	exterior remodel & 744 sf addition to retail	Env. Review: Catex	in review
	1.18	6,210	Owen Nostrant	29112 Roadside Dr.	Agoura Hills	new elements/landscaping, reconfigure parking & driveways	Env. Review: Catex	in review
	1.42	7,500	Whizin Market Square, LLC/Tucker Investment Group, LLC	28888 Roadside Dr.	Agoura Hills	100,000 sf existing, 14,850 sf new & 5,800 sf new dining & parking	Env. Review: Catex	in review

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.43	7,532	Cornerstone/Gelfand & Ben Tov	4700 Cornell Rd.	Agoura Hills	Mixed-Use Development (35 du, 17,830 sf office, 25,017 sf retail)	Env. Review: Pending	in review
	1.61	8,483	Heathcote for Buckley	30820 Agoura Rd.	Agoura Hills	Commercial/Medical Bldg (14,075 sf)	Env. Review: TBD	in review
	1.19	6,279	E.F. Moore & Co.	5018 Kanan Rd.	Agoura Hills	Agoura Village Mixed Use Development (48,500 sf retail/office)	Env. Review: MND	in review
	1.04	5,508	Agoura Park Project	29431 Agoura Rd.	Agoura Hills	New 45,000 sf fitness facility & 4,000 sf retail/restaurant building	Draft IS/MND	
AJT	1.76	9,295	Stonefield Development	1850 Fairway Dr.	Chino Hills	New 28 SFR in gated community in 35 acres		Tentative subdivision map approved
	1.83	9,660	Hidden Oaks Country Club	1285 Carbon Canyon Rd.	Chino Hills	New 107 residential lots hillside development with open space	Env. Review: EIR	in review
	1.45	7,657	Foremost Communities - Canyon Hills	16432 Carbon Canyon Rd.	Chino Hills	New 76 SFR development with open space	on hold	approved tract map
ASD	0.94	4,983	LA-RICS: SCECART	Lat/Long coordinates only	Cerritos	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	Completed	Completed
	1.91	10,069	LA-RICS: LASDLKD	Lat/Long coordinates only	Lakewood	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	Completed	Completed
	1.07	5,634	Tannahill	6109 Eberle St.	Lakewood	home improvement		
	1.82	9,586	9627 Beach St.	9627 Beach St.	Bellflower	CUP to modify existing wireless telecommunication facility		in review
	1.14	6,041	10317-19 Hacienda St.	10317-19 Hacienda St. & 17211-43 Carpintero Ave.	Bellflower	zone change & subdivide 2 lots into 13 SFR		in review
	1.87	9,873	10510 Alondra Blvd.	10510 & 10466 Alondra Blvd. & 10525 Trabuco St.	Bellflower	Consolidate 6 parcels into 2 parcels & change land use designation	Env. Review: MND	in review
	1.19	6,292	18601-18615 Airline Ave.	18601 Airline Ave.	Artesia	12-unit apartment development	MND	
	1.27	6,710	18747 Clarkdale Ave.	18747 Clarkdale Ave.	Artesia	3-story apartment project		
DPK	1.79	9,434	Santa Catalina Island Conservancy	708 Crescent Ave.	Avalon	demo hotel & build 9,084 ft visitor center	MND	in review
	1.85	9,760	333 Wrigley Rd.	333 Wrigley Rd.	Avalon	add 112 sf to site under construction		in review
	1.54	8,116	Casino Fuel Dock	2 Casino Wy.	Avalon	Casino Fuel Dock	Addendum to MND	in review
	1.45	7,639	145 Olive	145 Upper Olive St.	Avalon	construct a SFR with height variance		in review

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.75	9,264	Hamilton Cove Phase II Residential Development Project	100 Pebbly Beach Rd.	Avalon	Custom homes	Addendum to EIR	
	1.58	8,351	128 Sumner Ave.	128 Sumner Ave.	Avalon	create two new parcels	MND	in review
	1.54	8,127	Santa Catalina Island Golf Course (approx. Fairway #3)	5 Avalon Canyon Rd.	Avalon			
	1.84	9,739	115 Upper Terrace Rd.	115 Upper Terrace Rd.	Avalon	improve multi-unit structure (medium density residential)	CE	in review
	1.57	8,296	234 Sumner Ave.	234 Sumner Ave.	Avalon	new grocery store & loading bays for Vons Market	MND	in review
	1.23	6,517	1 St. Catherine Way	1 St. Catherine Wy.	Avalon	remove 75 ft/200 cy of hillside & construct bird exhibitions	MND	in review
	1.53	8,085	217 Metropole	217 Metropole	Avalon	Catalina Island Museum height variance, LCP, CUP	MND	in review
	1.43	7,537	199 Chimes Tower Rd.	189 & 199 Chimes Tower Rd.	Avalon	CUP to renovate residence/hotel, demo & construct new buildings	MND	in review
	1.87	9,869	60 Alta Vista Rd.	60 Alta Vista Rd.	Avalon	remove & replace wireless telecommunication antennas	Env. Status to be determined	in review
ENC1	0.77	4,071	Malibu Institute	901 Encinal Canyon Rd.	Malibu	develop mixed-use site w/ retreat facility, golf course, bungalow units, relocation of helipad	NOP - EIR	
	1.18	6,233	9802	5011 ENCINAL CANYON RD.	Malibu	NSFR, basement, garage, pool, spa, OWTS, terrace and decks	Open	
ENT	1.63	8,587	Calabasas Peak Motorway Residences	Calabasas Peak Motorway	Calabasas	4 individual SFR on 4 parcels, installation of a Waterworks District 29 tank, road & trail widening improvements	NOP - EIR	
	1.82	9,593	Mulholland Highway Scenic Corridor Phase III Project	22328 Mulholland Highway	Calabasas	improve traffic safety	NOI - MND	
	1.66	8,788	Wireless Telecommunications Facility Permit Project No. 150000601	24000 Parkway Calabasas	Calabasas	modify existing facility		
	0.92	4,833	Viewpoint Phase III	23620 Mulholland Highway	Calabasas	construct new buildings for the school	addendum to Final EIR	
	0.95	4,992	BSVERCOM Project	23401 Mulholland Highway	Calabasas	construct 3 new SFR	MND	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.22	1,184	3121 Old Topanga Canyon Rd. Single-Family Home	3121 Old Topanga Canyon Rd.	Calabasas	7,633 sf single-family residence	EIR	
	0.92	4,833	23620 Mulholland Highway	23620 Mulholland Hwy & 23602-4 Dry Canyon Cold Creek Rd.	Calabasas	Viewpoint School construct buildings, tennis courts, parking, etc	addendum to Final EIR	
	0.74	3,915	Viewpoint School Tennis Courts & Parking Lots Project	23238 Mulholland Highway	Calabasas	install tennis courts, building, parking & building renovation	NOI - ND/MND	
FTP	0.74	3,910	LA-RICS: MIR	Glen Oaks Blvd.	Glendale/Pasadena	LA-RICS LMR: STATEX 12/17/2015		
	1.77	9,342	LA-RICS: CRN	Gladys Mountain Way and Sugar Loaf Dr.	Glendale/La Canada Flintridge	LA-RICS LMR: STATEX 12/17/2015		
	1.57	8,313	A0865878		Pasadena	FCC ASR California Granted Not Constructed		
	1.70	8,998	A0850327		Pasadena	FCC ASR California Granted Not Constructed		
	1.66	8,780	1080 Glen Oaks Blvd.	1080 Glen Oaks Blvd.	Pasadena	Front addition & alteration		active
	0.75	3,945	2015-00341	1700 Lida St.	Pasadena	Art Center College of Design to replace facilities & add housing		completing environmental
	1.90	10,058	1347 Colorado Blvd.	1336 & 1347 Colorado Blvd.	Pasadena	construct 8-story hotel & commercial project		completing environmental
	1.54	8,135	11824	615 Linda Vista Ave.	Pasadena	variance for 6' high wood fence in front yard		new case
	1.57		LA SMSA Limited Partnership, 61' communication tower			Telecommunications tower/pole, FCC Reg.#1285927		
1.70		LA SMSA Limited Partnership, 80' communication tower			Telecommunications tower/pole, FCC Reg.#1288341			
GMT	1.61	8,507	LA-RICS: LACF157	15921 Spunky Canyon Rd.	Unincorporated	LA-RICS LMR: STATEX 1		
	0.97		LA Dept. of Water and Power upgrades	Barren Ridge to Haskell Canyon & Haskell Canyon to Rinaldi		Transmission system upgrades		
H-17A	1.89	9,978	LA-RICS: LACF028	7733 Greenleaf Ave.	Whittier	LA-RICS LMR: STATEX 1		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.76	9,271	A0826657			FCC ASR California Granted Not Constructed		
	0.91	4,798	6031 Citrus Ave.	6031 Citrus Ave.	Whittier	Founders Park Monument		approved-complete
	1.44	7,616	12206 Philadelphia St.	12206 Philadelphia St.	Whittier	Dog Park		approved-complete
	1.02	5,397	5303 Davidson Dr.	5303 Davidson Dr. & 5360 Workman Mill Rd.	Whittier	new 32-unit, 3-story combo of SFR dwelling units & attached townhomes		under staff review
	0.95	5,011	12001 Beverly Blvd.	12001 Beverly Blvd.	Whittier	The Heights at Beverly Blvd construct 40 detached condos		approved - under plan check submittal
	1.36	7,206	13406 Philadelphia St.	13406 Philadelphia St.	Whittier	Whittier College ADA		approved-complete
	1.59	8,391	7306-7316 Comstock	7306-16 Comstock	Whittier	Guilford-Penn Court-Heritage Housing new 11-unit multi-family residential condos		approved - under plan check submittal
	1.36	7,155	11757 Hadley St.	11757 Hadley St.	Whittier	Cambridge Place new 32-unit residential townhome project		approved - pending plan check submittal
	1.82	9,583	12423-12425 Whittier Blvd.	12423-12425 Whittier Blvd.	Whittier	Amesbury new 3-story, 55 townhome residential development		approved - under construction
	1.55	8,192	13615 Earlham Dr.	13615 Earlham Dr.	Whittier	Whittier College Science Building renovation		approved - under construction
	1.66	8,785	3718 Capitol Ave.	3718 Capitol Ave.	Industry	develop new 36,666 sf warehouse w/ office & mezzanine	ND/MND	application complete & env review ongoing
	1.76		LA County, 170' communication tower			Telecommunications tower/pole, FCC Reg.# 1287222		
	1.51		SCE Tehachapi Renewable Transmission Line Project			Transmission line project		
JOP	1.36		SCE Tehachapi			Transmission line project		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
			Renewable Transmission Line Project					
JPK	1.89	10,003	Gordon Mull/Gordon Ranch	above terminus of Lone Hill Ave/	Glendora	18-lot single-family subdivision (in process)	Draft EIR underway	in review
JPK2	1.86	9,804	Gordon Mull/Gordon Ranch	above terminus of Lone Hill Ave/	Glendora	18-lot single-family subdivision (in process)	Draft EIR underway	in review
LACF072	1.68	8,851	Malibu Institute	901 Encinal Canyon Rd.	Malibu	develop mixed-use site w/ retreat facility, golf course, bungalow units, relocation of helipad	NOP - EIR	
	0.75	3,953	9802	5011 ENCINAL CANYON RD.	Malibu	NSFR, basement, garage, pool, spa, OWTS, terrace and decks	Open	
LACFCP08	1.86	9,812	1283	2860 SWEETWATER MESA RD.	Malibu	NSFR 2 story pool & spa & guest house	Open	
	1.62	8,557	1592	21306 PACIFIC COAST HWY.	Malibu	1st and 2nd story addition	Open	
	1.54	8,141	1940	3843 RAMBLA PACIFICO ST.	Malibu	NSFR with subterranean garage, grading, retaining walls, OWTS	Open	
	1.04	5,510	2397	3712 CARBON CANYON RD.	Malibu	NSFR w/ ESHA	Open	
	1.50	7,900	2761	22030 PACIFIC COAST HWY.	Malibu	OWTS	Open	
	1.45	7,641	3207	21653 RAMBLA VISTA	Malibu	slope repair, retaining walls over 6 feet	Open	
	1.93	10,195	3641	22729 PACIFIC COAST HWY.	Malibu	New Sign for Westside Estate Real Estate Agency at 22741 PCH	Open	
	1.10	5,831	3803	22201 CARBON MESA RD.	Malibu	NOWTS, N Gar, N Drwvy, Soldier Piles, Pool	Open	
	1.42	7,517	4175	20741 LAS FLORES MESA DR.	Malibu	NSFR, OWTS, pool/ spa, in ESHA	Open	
	1.66	8,747	4938	22420 PACIFIC COAST HWY.	Malibu	NSFR, N Pool, N AOWTS, Demo ESFR	Open	
	1.39	7,339	5323	20715 LAS FLORES MESA DR.	Malibu	NSFR, Height over 18'	Open	
	1.26	6,676	5502	21425 DEERPATH LN	Malibu	*CE* storage Shed & Tree House	Open	
1.71	9,003	5630	21100 PACIFIC COAST HWY.	Malibu	Reconstr. House dest by fire, NOWTS	Open		
1.56	8,219	5890	20963 LAS FLORES	Malibu	NSFR, NOWTS, (N) pool/spa	Open		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				MESA DR.				
	1.44	7,615	5906	21629 PACIFIC COAST HWY.	Malibu	*CE* Deck and outdoor area in rear yard	Open	
	1.88	9,904	6354	22669 PACIFIC COAST HWY.	Malibu	After-the-fact Awning & Fencing	Open	
	1.73	9,150	6369	21026 PACIFIC COAST HWY.	Malibu	Int & Ext. Remodel	Open	
	1.35	7,131	6925	3959 VILLA COSTERA	Malibu	NSFR, NOWTS Det Guest House, Pool, Ten. Crt.	Open	
	1.56	8,223	7365	22224 PACIFIC COAST HWY.	Malibu	LM, demo of 2 ESFR, and construct 1 NSFR, pool, bulkhead	Open	
	1.77	9,336	7506	22549 PACIFIC COAST HWY.	Malibu	1 Question Pre-App For Geology	Open	
	1.15	6,046	7565	22139 CARBON MESA RD.	Malibu	NSFR	Open	
	1.19	6,274	7891	3320 SUMAC RIDGE RD.	Malibu	ATF landscaping	Open	
	1.93	10,203	8035	22741 PACIFIC COAST HWY.	Malibu	Joint Use of Existing Parking Facility at 22741 PCH	Open	
	1.86	9,812	8338	3093 SWEETWATER MESA RD.	Malibu	NSFR- (related to CDP 5-86-293), pool, AOWTS	Open	
	1.36	7,188	8549	22545 CARBON MESA RD.	Malibu	(N) pool and addition Landscaping	Open	
	1.62	8,557	9063	21306 PACIFIC COAST HWY.	Malibu	Pre-App 1 Question	Open	
	1.85	9,770	9109	20786 COOL OAK WAY	Malibu	ATF accessory structure, portable sheds, setback issue	Open	
	1.21	6,405	9171	3367 RAMBLA PACIFICO ST.	Malibu	NSFR w attached garage, OWTS, elevated deck and pool.	Open	
	1.16	6,103	9230	22127 CARBON MESA RD.	Malibu	NSFR and pool	Open	
	1.51	7,997	9275	3861 RAMBLA PACIFICO ST.	Malibu	NSFR	Open	
	1.53	8,074	9274	3863 RAMBLA PACIFICO ST.	Malibu	NSFR- Hillside	Open	
	1.43	7,568	9537	21651 RAMBLA VISTA	Malibu	LLA/No development and No ESHA	Open	
	1.73	9,119	9754	22523 PACIFIC	Malibu	CUP for Liquor Store	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				COAST HWY.				
	1.70	9,001	9972	21106 PACIFIC COAST HWY.	Malibu	(N) SFR, (N) OWTS, Bulkhead	Open	
	1.49	7,872	10036	22003 PACIFIC COAST HWY.	Malibu	N SFR w/ LLA	Open	
	1.49	7,848	10035	21977 PACIFIC COAST HWY.	Malibu	NSFR	Open	
	1.49	7,868	10126	21950 PACIFIC COAST HWY.	Malibu	(N) SFR, Demo and rebuild	Open	
	1.27	6,698	10194	3989 VILLA COSTERA	Malibu	New detached studio	Open	
	1.65	8,701	10268	21229 PACIFIC COAST HWY.	Malibu	After-the-Fact Tenant Improvement	Open	
	1.06	5,582	10273	3205 SUMAC RIDGE RD.	Malibu	Remodel and addition to existing single- family residence, new septic system, and new pool/spa	Open	
	1.42	7,504	10374	3849 RAMBLA ORIENTA ST.	Malibu	NSFR	Open	
	1.39	7,356	10390	3816 PASEO HIDALGO ST.	Malibu	NSFR	Open	
	1.43	7,568	10688	21651 RAMBLA VISTA	Malibu	COC for vacant lot	Open	
	1.71	9,003	10585	21100 PACIFIC COAST HWY.	Malibu	New Single Family Residence, ocean decks, 2 car garage, roof garden with spa, new owts, sea wall, and pile foundations	Open	
	1.49	7,886	10590	21840 PACIFIC COAST HWY.	Malibu	COC	Open	
	1.93	10,167	10654	22863 BECKLEDGE TER	Malibu	PVD	Open	
	1.33	7,024	10722	21455 CALLE DEL BARCO	Malibu	Wall repair for foundation	Open	
	1.52	8,001	10748	22137 PACIFIC COAST HWY.	Malibu	SoCal Gas-advanced meter	Open	
	1.94	10,219	10755	22716 PACIFIC COAST HWY.	Malibu	CUP Amendment to relocate interior restaurant service area to exterior bar service area and APR for new exterior bar.	Open	
	1.67	8,803	10758	22435 PACIFIC COAST HWY.	Malibu	N trellis and entry gate	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	2.00	10,560	10827	22775 PACIFIC COAST HWY.	Malibu	New Sign	Open	
	1.70	8,980	10835	22467 PACIFIC COAST HWY.	Malibu	Amendment to relocate an elevator over 28 feet tall to the front of a new commercial building, within the FYSB.	Open	
	1.68	8,896	10843	22446 PACIFIC COAST HWY.	Malibu	Interior remodel and addition	Open	
	1.44	7,596	10841	3764 LAS FLORES CANYON RD.	Malibu	Interior remodel, raise in roof height, pool and hardscape.	Open	
	1.91	10,061	10875	22725 PACIFIC COAST HWY.	Malibu	Replace existing parking lights with new poles and light fixtures.	Open	
	1.46	7,721	10876	21070 LAS FLORES MESA DR.	Malibu	Lot merger, new pool/spa, deck, trellis	Open	
	1.34	7,075	10878	3489 RAMBLA PACIFICO ST.	Malibu	Phase 1	Open	
	1.67	8,838	10918	3966 LAS FLORES CANYON RD.	Malibu	New shade structure	Open	
	1.97	10,383	10948	22761 PACIFIC COAST HWY.	Malibu	New sign for dun & bradstreet	Open	
	1.93	10,195	10960	22729 PACIFIC COAST HWY.	Malibu	Museum (Auto Show Room)	Open	
	1.97	10,378	10992	22752 PACIFIC COAST HWY.	Malibu	Zoning change from CV-1 to CV-2.	Open	
	1.98	10,472	10991	22762 PACIFIC COAST HWY.	Malibu	Zoning change from CC to CV-2.	Open	
LARICSHQ	0.61	3,239	LA-RICS: FCCF	1320 N. Eastern Ave.	Unincorporated	LA-RICS LMR: STATEX 1		
	0.49	2,587	A0725572			FCC ASR California Granted Not Constructed		
	1.94	10,233	AG Hotel	808 W. Garvey Ave.	Monterey Park	new 6-story hotel w/ restaurants, retail, and apartments		approved
	1.47	7,776	Los Angeles	3330 City Terrace Dr.	Los Angeles	new wireless telecommunication facility	CE	
	1.84	9,719	Los Angeles	5809 E. Beverly Blvd.	Los Angeles	CUP for new Verizon Wireless wireless telecommunications facility mounted on streetlight pole	CE	
	0.49		LA County, 60' communication tower			Telecommunications tower/pole, FCC Reg.# 1278618		
LEPS	0.45	2,354	Malibu	Pacific Coast Hwy. and Encinal	Malibu	Revise tract map to create 69 SFR lots, open space, public facility	CE	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				Canyon Rd.				
	1.26	6,669	1697	31866 SEA LEVEL DR.	Malibu	NSFR - revisions, and Sea Level Dr Road Widening	Open	
	1.27	6,686	1696	31864 SEA LEVEL DR.	Malibu	NSFR - revision	Open	
	1.23	6,470	1799	33905 PACIFIC COAST HWY.	Malibu	Conditional Use Permit Renewal & Merge Previous Coastal Commission Approvals	Open	
	1.55	8,201	2083	31654 BROAD BEACH RD.	Malibu	after-fact driveway alteration	Open	
	1.50	7,914	3537	31720 BROAD BEACH RD.	Malibu	Lechuza Beach public access and disabled parking spaces	Open	
	0.21	1,106	4086	4229 AVENIDA DE LA ENCINAL	Malibu	1 story NSFR, Pool/ Spa, FYSB Reduction	Open	
	1.80	9,496	4145	31535 PACIFIC COAST HWY.	Malibu	NSFR, 2nd unit, NAOWTS	Open	
	1.96	10,350	4709	31356 BROAD BEACH RD.	Malibu	Deck repair, follow-up to ECDP 08-006	Open	
	1.03	5,423	5150	33602 PACIFIC COAST HWY.	Malibu	Foundation repair, follow up to ECDP	Open	
	1.90	10,051	6125	31430 BROAD BEACH RD.	Malibu	Add to ESFR, Lot Merger, N Spa	Open	
	1.14	6,020	6782	31960 PACIFIC COAST HWY.	Malibu	Follow up to ECDP, addition & remodel	Open	
	0.42	2,220	7292	32640 PACIFIC COAST HWY.	Malibu	*CE for switchback trail, stone wall	Open	
	1.06	5,580	7337	33610 PACIFIC COAST HWY.	Malibu	New front yard fence on a vacant parcel	Open	
	0.92	4,870	8355	33522 PACIFIC COAST HWY.	Malibu	Slope restoration, relocation of seawall w/ revegetation	Open	
	0.65	3,427	8799	33306 PACIFIC COAST HWY.	Malibu	ATF retaining walls and concrete storage on VAR slopes	Open	
	0.78	4,095	8813	33398 PACIFIC COAST HWY.	Malibu	NSFR	Open	
	0.78	4,113	8988	33419 PACIFIC COAST HWY.	Malibu	ATF, retaining walls, gate and fence	Open	
	0.75	3,943	9049	4140 ENCINAL CANYON RD.	Malibu	New Water Well	Open	
	1.70	8,961	9262	31569 SEA LEVEL	Malibu	Follow up to ECDP 13-007 For New	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				DR.		OWTS		
	0.42	2,220	9277	32640 PACIFIC COAST HWY.	Malibu	Slope repair and drainage system repair	Open	
	0.14	738	9364	4421 AVENIDA DE LA ENCINAL	Malibu	NSFR with Landscaping, Pool, Pool House with ESHA	Open	
	1.34	7,068	9397	33728 PACIFIC COAST HWY.	Malibu	NSFR/(N)OWTS/(N)Pool/Landscape	Open	
	0.73	3,831	9405	33355 PACIFIC COAST HWY.	Malibu	NSFR, OWTS, Pool, SPA, basement, 2nd unit	Open	
	1.77	9,332	9412	31546 VICTORIA POINT RD.	Malibu	NSFR	Open	
	1.77	9,358	9411	31540 VICTORIA POINT RD.	Malibu	NSFR	Open	
	1.30	6,879	9458	31848 BROAD BEACH RD.	Malibu	Widen access to W Sea Level Dr to 20' to meet Emergency Ingress and Egress requirements (with property at 31885 W Sea Level Drive)	Open	
	1.34	7,080	9552	31751 PACIFIC COAST HWY.	Malibu	2nd Story Addition over height approx 657 Sq Ft	Open	
	1.88	9,929	9648	31438 BROAD BEACH RD.	Malibu	NSFR with attached garage, pool, spa, roof deck on beach front	Open	
	0.64	3,383	9741	33301 PACIFIC COAST HWY.	Malibu	NSFR, OWTS, pool, spa, 4 car attached garage,	Open	
	1.10	5,794	9786	33603 PACIFIC COAST HWY.	Malibu	Landscaping, with a new pond and erosion grading,	Open	
	1.68	8,852	9802	5011 ENCINAL CANYON RD.	Malibu	NSFR, basement, garage, pool, spa, OWTS, terrace and decks	Open	
	0.78	4,095	10131	33398 PACIFIC COAST HWY.	Malibu	LLA and NSFR	Open	
	0.76	4,011	10132	33386 PACIFIC COAST HWY.	Malibu	NSFR Beachfront	Open	
	0.13	691	10133	4501 VISTA DEL PRESEAS	Malibu	Municipal water tank and water line improvements.	Open	
	0.39	2,067	10158	33014 PACIFIC COAST HWY.	Malibu	Remodel, addition, and a detached garage	Open	
	1.72	9,087	10195	31583 PACIFIC COAST HWY.	Malibu	Certificate of Compliance	Open	
	0.13	691	10519	4501 VISTA DEL PRESEAS	Malibu	Interpretation of use	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.79	4,161	10570	4102 ENCINAL CANYON RD.	Malibu	Fence	Open	
	1.37	7,241	10616	31800 BROAD BEACH RD.	Malibu	N SFR, OWTS, pool, grading, retaining walls	Open	
	1.66	8,761	10684	31595 BROAD BEACH RD.	Malibu	Interior, exterior remodel and reroof	Open	
	1.14	5,993	10718	32001 PACIFIC COAST HWY.	Malibu	Ground mounted solar	Open	
	1.25	6,613	10801	33744 PACIFIC COAST HWY.	Malibu	Interior remodel and exterior wall modifications	Open	
	0.89	4,723	10855	32223 PACIFIC COAST HWY.	Malibu	Trailer	Open	
	1.40	7,387	10863	31831 COTTONTAIL LN.	Malibu	Phase 1	Open	
	1.50	7,914	10905	31720 BROAD BEACH RD.	Malibu	Phase 1	Open	
	1.23	6,480	10967	31948 PACIFIC COAST HWY.	Malibu	Enclose existing overhang area, demo square feet, and an interior remodel	Open	
MML	0.00	4	LA-RICS: MAM	Angeles National Forest - 4N46 Magic Mountain Rd.	Unincorporated	LA-RICS LMR: STATEX 2		
OAT	1.27	6,729	LA-RICS: ONK	Palo Sola Truck Rd.	Chatsworth (Area)	LA-RICS LMR: STATEX 1		
	Immediately adjacent		Sunshine Canyon Landfill 66-kV Subtransmission Line Segment Relocation			66-kV subtransmission line segment relocation		
PASPD01	1.63	8,589	A0850327		Pasadena	FCC ASR California Granted Not Constructed		
	0.03	178	LA-RICS: PASDNPDP	Lat/Long coordinates only	Pasadena	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	8/4/2015	Completed
	1.73	9,139	249 Mockingbird Ln.	249 Mockingbird Ln.	South Pasadena	new SFR with garage and roof deck & strengthen retaining walls		in review
	1.68	8,885	203 Cedar Crest Ave.	203 Cedar Crest Ave. & 204 Mockingbird Ln.	South Pasadena	new residential duplex with garage and retaining wall		in review
	1.28	6,741	555 W. California Blvd.	555 W. California Blvd.	Pasadena	Variance for fence open design requirement and height	new case	
	0.39	2,080	180 S. Euclid Ave.	180 S. Euclid Ave.	Pasadena	Demolish existing structure	active	
	0.68	3,577	799 E. Green St.	799 E. Green St.	Pasadena	One new wall sign	active	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.60	8,449	167 N. Sierra Bonita Ave.	167 N. Sierra Bonita Ave.	Pasadena	New 6-unit apartment	active - final design review	
	0.09	476	254 E. Union St.	254 E. Union St.	Pasadena	New mixed use building	active	
	1.08	5,702	1105 E. Villa St.	1105 E. Villa St.	Pasadena	Demo 6 SFR homes & construct 17-unit condo w/ subterranean parking	active	
	1.54	8,155	1080 Glen Oaks Blvd.	1080 Glen Oaks Blvd.	Pasadena	Front addition & alterations	active	
	0.29	1,544	464-468 E. Colorado Blvd.	464-468 E. Colorado Blvd.	Pasadena	To alter the building paint colors	active	
	0.81	4,261	146 S. Lake Ave.	146 S. Lake Ave.	Pasadena	New awning with signage	active	
	1.71	9,009	1515 Loma Vista St.	1515 Loma Vista St.	Pasadena	New west front yard & east side yard fences and gates	active	
	1.33	7,010	315 Bellefontaine St.	315 Bellefontaine St.	Pasadena	West side elevation alterations	active	
	0.30	1,583	179 E. Colorado Blvd.	179 E. Colorado Blvd.	Pasadena	New Flemings restaurant	active	
	0.28	1,473	64 E. Colorado Blvd.	64 E. Colorado Blvd.	Pasadena	New signs, change storefront colors & buikhead material	active	
	0.55	2,910	319 S. Arroyo Parkway	319 S. Arroyo Pkwy.	Pasadena	New tenant signage for "Nail'D It"	active	
	0.46	2,404	52 W. Green St.	52 W. Green St.	Pasadena	Storefront alteration to remove the stucco cladding & alter entryway	active	
	1.93	10,178	1732 Loma Vista St.	1732 Loma Vista St.	Pasadena	Add 2 dormers on the street facing elevation, add 2 dormers on side	active	
	0.73	3,833	160 N. Lake Ave.	160 N. Lake Ave.	Pasadena	Minor storefront alteration for Ralphs Grocery Store	active	
	1.23	6,499	773 N. Wilson Ave.	773 N. Wilson Ave.	Pasadena	Wood side and rear yard fence and driveway gate	completed	
	1.44	7,596	91 Harkness Ave.	91 Harkness Ave.	Pasadena	9-unit multi-family residential project	active	
	1.83	9,639	92 N. Allen Ave.	92 N. Allen Ave.	Pasadena	9-unit multi-family residential project	active	
	1.68	8,876	1182 N. Michigan Ave.	1182 N. Michigan Ave.	Pasadena	To legalize new front windows	active	
	1.28	6,776	755 Mar Vista Ave.	755 Mar Vista Ave.	Pasadena	Modification of a second-story vent to a window & minor addition at the rear	active	
	0.61	3,225	11 W. Del Mar Blvd.	11 W. Del Mar Blvd.	Pasadena	Master sign plan for a multi-tenant building	active	
	1.27	6,700	314 Alpine St.	314 Alpine St.	Pasadena	New six unit condominium development	active	

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	0.43	2,275	599 E. Colorado Blvd.	599 E. Colorado Blvd.	Pasadena	Two wall signs and one projecting sign	active	
	1.75	9,215	1508 E. Mountain Ave.	1508 E. Mountain Ave.	Pasadena	New wall along side property line	completed	
	0.48	2,510	107 W. Colorado Blvd.	107 W. Colorado Blvd.	Pasadena	One new illuminated wall sign and one non-illuminated blade sign	active	
	0.70	3,687	104 E. Orange Grove	104 E. Orange Grove	Pasadena	Demo 3 buildings, build 21 residential units w/ subterranean parking	active	
	1.50	7,924	275 Arlington Dr.	275 Arlington Dr.	Pasadena	Arlington Garden zone change from RS-4 to Open Space	developing recommendation	
	0.29	1,530	2014-00157	135 Oakland Ave.	Pasadena	Fuller Seminary: change map boundaries & development schedule	incomplete	
	0.95	5,004	2009-00461	100 California Blvd.	Pasadena	Huntington Hospital: reconfigure boundary area, rehab, demo & construction over 20 years	completing environmental	
	0.26	1,381	6294	262 Los Robles Ave.	Pasadena	Mirador - Demo & construct apartments in 4 buildings	incomplete	
	0.22	1,187	6279	78 Marengo Ave.	Pasadena	Julia Morgan Building/Kimpton - rehab building & add new hotel	completing environmental	
	0.50	2,621	11801	277 El Molino Ave.	Pasadena	Platinum Pasadena - Demo 2 buildings & construct urban housing complex	complete: scheduled	
	0.82	4,322	6172	922-936 E. Green St.	Pasadena	Mixed-use project - Demo buildings & construct commercial & residential units	incomplete	
	1.93	10,174	1347 Colorado Blvd.	1336 & 1347 E. Colorado Blvd.	Pasadena	Hotel Project - construct hotel and commercial	completing environmental	
	1.00	5,304	11827	303 Palmetto Dr.	Pasadena	Enclose existing screen porch. Variance to exceed max FAR	new case: assigned	
	1.28	6,768	11825	555 California Blvd.	Pasadena	Variance for fence open design requirement and height	new case: assigned	
	1.18	6,251	78325	655 Westminister Dr.	Pasadena	TTM to subdivide 1.3 ac parcel for 9 SFR & park	new case: assigned	
	1.60	8,468	11824	615 Linda Vista Ave.	Pasadena	Minor variance for 6' high wood fence in front yard	new case: assigned	
	1.03	5,422	11828	39 Congress St.	Pasadena	MCUP for transit oriented development for medical office building & parking	new case: assigned	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.97	10,412	6364	154 Avenue 64	Pasadena	MCUP for expansion of non-conforming use: add to SFR in RS-6	new case: assigned	
	0.98	5,154	6373	407 Bellmore Wy.	Pasadena	Demo house & garage, rebuild house and garage	new case: assigned	
	1.63		LA SMSA Limited Partnership, 80' communication tower			Telecommunications tower/pole, FCC Reg.#1288341		
PDC	1.84	9,739	A0871124		Beverly Hills	FCC ASR California Granted Not Constructed		
	0.09	494	LA-RICS: WHD	Lat/Long coordinates only	West Hollywood	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	Completed	Completed
	1.99	10,502	7500-7514 Sunset Blvd.	7500 Sunset Blvd.	Los Angeles	7500-7514 Sunset Blvd.		
	1.77	9,354	1022-1054 S. La Cienega Blvd.	1022 S. La Cienega Blvd.	Los Angeles	1022-1054 S. La Cienega Blvd.		
	0.49	2,576	8720 Beverly Blvd.	8720 Beverly Blvd.	Los Angeles	8720 Beverly Blvd.		
	0.78	4,113	300 South Wetherly Dr.	300 S. Wetherly Dr.	Los Angeles	300 South Wetherly Dr.		
	1.78	9,385	6233-6245 W. Wilshire Blvd.	6233 W. Wilshire Blvd.	Los Angeles	6233-6245 W. Wilshire Blvd.		
	1.33	7,035	7909 Beverly Blvd.	7909 Beverly Blvd.	Los Angeles	7909 Beverly Blvd.		
	1.33	7,035	7901 Beverly Blvd.	7901 Beverly Blvd.	Los Angeles	7901 Beverly Blvd.		
	1.98	10,472	6001-6067 West Wilshire Blvd.	6001 West Wilshire Blvd.	Los Angeles	6001-6067 West Wilshire Blvd.		
	1.99	10,496	6067 Wilshire Blvd.	6067 Wilshire Blvd.	Los Angeles	6067 Wilshire Blvd.		
	1.36	7,161	8150 W. Sunset Boulevard	8150 W. Sunset Blvd.	Los Angeles	8150 W. Sunset Boulevard		
	0.86	4,548	City Hall Parking Structure	8300 Santa Monica Blvd.	West Hollywood	construct 200-space automated parking garage w/ plaza & entry service area	under construction	
	0.56	2,975	Billboard Project	9015 Sunset Blvd.	West Hollywood	remove roof-mounted sign & install new freestanding, double-sided billboard atop new pole	IS/MND	
	0.48	2,519	Center for Early Education	563 N. Alfred St.	West Hollywood	redevelop & expand campus w/ new 2.32 acres of properties	IS/MND	
	1.36	7,161	Mixed-Use Project - City of LA	8150 Sunset Blvd.	West Hollywood	Redevelop 2.56 acres w/ mixed-use residential & retail	EIR	
	0.47	2,499	Mixed-Use Project	8899 Beverly Blvd.	West Hollywood	expand office building to residential w/ retail	Final EIR	

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	0.85	4,478	Avenues Streetscape Master Plan	Almont Dr. and La Peer Dr.	West Hollywood	plan to improve the aesthetics and mobility of commercial district	ND	
	0.47	2,477	Mixed-Use Project	8555 Santa Monica Blvd.	West Hollywood	new 5-story building w/ apartments, restaurant, and retail uses.	Draft EIR	
	0.54	2,870	Off-Site Signage Study	Sunset Blvd.	West Hollywood	comprehensive evaluation of economic, urban design, land use & technological aspects of off-site advertising		
	0.84	4,419	Mixed-Use Project	8497 Sunset Blvd.	West Hollywood	construct 5-level, 28,139 sf mixed-use building & parking	IS/MND	
	1.06	5,612	SMB20 project	8120 Santa Monica Blvd.	West Hollywood	demo commercial buildings, construct 35,975 sf mixed-use development	Final EIR	
	0.31	1,618	Melrose Triangle Project	9040 Santa Monica Blvd.	West Hollywood	Proposed mixed-use commercial & residential project	EIR	
	0.20	1,073	San Vicente Inn	850 N. San Vicente Blvd.	West Hollywood	rehab of an urban inn & demo of existing buildings	IS/ND	
	0.16	823	Commercial structure	8650 Melrose Avenue	West Hollywood	construct 20-story 18,832 sf commercial structure w/ retail, office & restaurant	ND	
	0.44	2,325	Sprouts	8550 Santa Monica Blvd.	West Hollywood	Construct new commercial building	EIR	
	1.27	6,712	Tall Wall project	8228 Sunset Blvd.	West Hollywood	install new tall wall sign with lighting on existing building	MND	
	0.54	2,870	Creative Off-Site Signs	8755 Sunset Blvd.	West Hollywood	design and construction of offsite advertising sign		
	1.51	7,983	602 N. Beverly Dr.	602 N. Beverly Dr.	Beverly Hills	Minor Accommodation: construct accessory structure	on hold	
	1.66	8,768	228 S. Beverly Dr.	228 S. Beverly Dr.	Beverly Hills	Zone Amendment & Dev. Plan Review: add 2,202 sf lunchroom to existing commercial structure	PC subcommittee	
	1.45	7,640	264 S. La Cienega Blvd.	264 S. La Cienega Blvd.	Beverly Hills	CUP: "Sixt" Car rental facility	under review	
	1.18	6,236	9000 Wilshire Blvd.	9000 Wilshire Blvd.	Beverly Hills	Dev. Plan Review: new 3-story office building	under review	
	1.06	5,583	161 N. Stanley Dr.	161 N. Stanley Dr.	Beverly Hills	Reasonable Accommodation: add front yard paving	PC hearing	
	1.52	8,020	312 N. Rodeo Dr.	312 N. Rodeo Dr.	Beverly Hills	Dev. Plan Review & Parking Permit: add 3rd story to existing building	under review	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.98	5,186	406 Robert Lane	406 Robert Ln.	Beverly Hills	Tree Removal Permit	in review	
	1.67	8,829	1010 N. Rexford Dr.	1010 N. Rexford Dr.	Beverly Hills	Central R-1 permit: new accessory structure	correcting	
	1.90	10,050	9460 Olympic Blvd.	9460 Olympic Blvd.	Beverly Hills	CUP: convert existing auto service bays to convenience store/retail	PC hearing	
	1.76	9,297	9212 Olympic Blvd.	9212 Olympic Blvd.	Beverly Hills	Dev. Plan Review & CUP: new 3-story office building	under review	
	0.81	4,297	332 N. Oakhurst Dr.	332 N. Oakhurst Dr.	Beverly Hills	Tentative Tract Map, Dev. Plan Review & R-4 Permit: construct condos	PC hearing	
	1.91	10,083	1510 Lexington Rd.	1510 Lexington Rd.	Beverly Hills	Hillside R-1 Permit for a new single-family residence (15,000 sf)	incomplete letter	
	1.57	8,264	1011 Lexington Rd.	1011 Lexington Rd.	Beverly Hills	Zone Text Amendment - permit ramping over driveway	under review	
	1.49	7,851	291 S. La Cienega Blvd.	291 S. La Cienega Blvd.	Beverly Hills	CUP request for West Coast Ultrasound Institute	Code Enforcement	
	1.21	6,404	809 Hillcrest Rd.	809 Hillside Rd.	Beverly Hills	Hillside R-1 Permit for an addition	approved	
	1.05	5,530	322 Foothill Rd.	322 Foothill Rd.	Beverly Hills	Zone Text Amendment & CUP request for Sephardic Magen David Congregation	working on traffic/parking	
	1.29	6,829	310 N. Crescent Dr.	310 N. Crescent Dr.	Beverly Hills	Zone Text Amendment & R-4 Permit: allow multi-family residential buildings additional height	PC hearing	
	1.30	6,877	250 N. Crescent Dr.	250 N. Crescent Dr.	Beverly Hills	Density Bonus Permit & Dev. Plan Review: construct 8-unit condo building	in review	
	1.36	7,200	320 N. Canon Dr.	320 N. Canon Dr.	Beverly Hills	Medical Use Overlay Zone: add 474 sf medical clinic to existing store	City Council hearing - tentative	
	1.05	5,543	9291 Burton Way	9291 Burton Way	Beverly Hills	General Plan Amendment & Overlay Zone: construct rooftop enclosures on L'Ermitage Hotel	MND tentative	
	1.51	7,983	602 N. Beverly Dr.	602 N. Beverly Dr.	Beverly Hills	Minor Accommodation: construct accessory structure	on hold	
	1.66	8,768	228 S. Beverly Dr.	228 S. Beverly Dr.	Beverly Hills	Zone Amendment & Dev. Plan Review: add 2,202 sf lunchroom to existing commercial structure	PC subcommittee	
	1.85		T-Mobile West LLC, 85' communication tower			Telecommunications tower/pole, FCC Reg.#1290746		

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
PHN	0.01	70	LA-RICS: PHN	Lat/Long coordinates only	Unincorporated	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	Completed	Completed
	1.58	8,367	Los Angeles	2356 Fullerton Rd.	La Habra Heights		CE	
	1.96	10,351	Fullerton Rd.	Fullerton Rd.	La Habra Heights	CUP for new wireless telecommunicaion facility (install antenna panels on SCE tower)		under review
	1.75	9,243	2025 Ranch Hill Dr.	2025 Ranch Hill Dr.	La Habra Heights	Standards Mod. Admin for 2nd level addition to existing home.		
	1.58	8,352	2358 Fullerton Dr.	2358 Fullerton Dr.	La Habra Heights	new 10,270 sf 2-story SFR		
	1.67	8,801	340-420 W. Central Ave.	340 W. Central Ave.	Brea	Central Park Village - develop residential, commercial, & medical uses	EIR - approved	
	1.92	10,134	583 W. Explorer St.	583 W. Explorer St.	Brea	add retail sales of vehicles to existing BikeBerry Inc. internet business	approved	
	1.93	10,203	950, 1050, 1150 W. Central Ave.	950, 1050, 1150 W. Central Ave.	Brea	Subdivide 3 parcels for industrial condo purposes	approved	
0.52		SCE Tehachapi Renewable Transmission Line Project				Transmission line project		
PWT	0.52	2,728	395	6316 CAVALLERI RD.	Malibu	Addition to SFR/Interior remodel	Open	
	0.26	1,352	8697	6120 CAVALLERI RD.	Malibu	PVD conducted in response to 28918 Verde Mesa Lane	Open	
	1.63	8,616	1491	27628 PACIFIC COAST HWY.	Malibu	ATF driveway re-design, grading	Open	
	0.73	3,837	2164	6387 ZUMA MESA DR.	Malibu	NSFR	Open	
	0.73	3,854	2163	6397 ZUMA MESA DR.	Malibu	NSFR	Open	
	1.57	8,295	2603	27712 PACIFIC COAST HWY.	Malibu	Rock Revetment	Open	
	1.46	7,697	2844	30001 ZENITH POINT RD.	Malibu	CE* Int. Rem., Raise Roofline, Inc deck size	Open	
	1.96	10,335	2863	6304 SEA STAR DR.	Malibu	NSFR attached garage, Pool/SPA	Open	
	0.62	3,289	2985	5945 RAMIREZ CANYON RD.	Malibu	NSFR, pool, spa	Open	
1.57	8,297	3337	6130 VIA CABRILLO ST.	Malibu	OWTS follow up to ECDP 05-065	Open		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.75	9,214	3383	29458 BLUEWATER RD.	Malibu	Int Remodel and change roof line 24' to 28'	Open	
	1.89	10,004	3517	6246 SEADRIFT COVE	Malibu	Add to ESFR, NOWTS, Heights over 18'	Open	
	0.69	3,618	3559	6140 GALAHAD RD.	Malibu	NSFR, NOWTS, Bsmnt, Heights over 18'	Open	
	1.94	10,256	3621	6270 SEA STAR DR.	Malibu	NSFR, pool, spa, NOWTS	Open	
	1.94	10,256	3619	6282 SEA STAR DR.	Malibu	NSFR, NOWTS, pool/spa, heights over 18'	Open	
	0.99	5,203	3671	6180 RAMIREZ CANYON RD.	Malibu	NSFR, NOWTS, Basement heights over 18', Pool	Open	
	1.01	5,318	3816	5763 BUSCH DR.	Malibu	After the Fact Add to ESFR 184 Sq. Ft.	Open	
	1.01	5,318	3890	5763 BUSCH DR.	Malibu	New Pool	Open	
	1.76	9,306	3948	30050 PACIFIC COAST HWY.	Malibu	NOWTS Restrooms 3,4,5	Open	
	0.82	4,318	3957	6459 KANAN DUME RD.	Malibu	Piranah OWTS Follow up to ECDP	Open	
	1.41	7,448	4122	5936 FILAREE HEIGHTS RD.	Malibu	Add to ESFR; Landscaping	Open	
	1.93	10,187	4295	27318 WINDING WAY	Malibu	NSFR, swimming pool, OWTS, jacuzzi	Open	
	1.14	6,003	4591	6191 MURPHY WAY	Malibu	NSFR, Guest House, Pool/spr	Open	
	1.11	5,861	4844	29255 HEATHERCLIFF RD.	Malibu	New 3-unit condo bldg, NAOWTS, sub garage, hardscape, LCPA for zone discrepancy	Open	
	1.70	8,988	5028	7050 DUME DR.	Malibu	Demo ESFR Construc NSFR & other	Open	
	0.96	5,065	5413	29169 HEATHERCLIFF RD.	Malibu	New Restaurant - Village Caf -- & Tenant Improvements	Open	
	1.27	6,716	5794	28012 SEA LANE DR.	Malibu	*CE* Retaining Wall	Open	
	1.22	6,436	5844	6579 WANDERMERE RD.	Malibu	*CE* ATF 700 sq. ft. studio	Open	
	0.85	4,468	5879	28955 PACIFIC COAST HWY.	Malibu	Replace Stairs with Elevator; Construct New Exterior Stairs	Open	
	1.38	7,260	6028	6851 FERNHILL DR.	Malibu	LLA - 2 adj parcels, no new development	Open	
	1.20	6,360	6075	29201 LARKSPUR LN.	Malibu	New Pool/Spa	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.08	5,716	6095	28834 SELFRIDGE DR.	Malibu	Add to ESFR, Npool, outdoor work	Open	
	0.54	2,849	6259	6315 GAYTON PL	Malibu	Relocate OWTS, N Pool/Spa	Open	
	1.54	8,116	6260	28899 GRAYFOX ST.	Malibu	*CE* Landscaping Slope Repair	Open	
	0.91	4,815	6554	6166 RAMIREZ CANYON RD.	Malibu	ARC Initial Evaluation	Open	
	0.56	2,950	6594	6341 GAYTON PL	Malibu	NOWTS & Int Remodel & Add to ESFR	Open	
	1.39	7,350	7079	29500 PACIFIC COAST HWY.	Malibu	Replace existing cabinet with a pedestal (wireless)	Open	
	1.15	6,073	7148	6050 MURPHY WAY	Malibu	NSFR	Open	
	0.97	5,122	7358	5801 MURPHY WAY	Malibu	New water well for irrigation / landscaping	Open	
	1.75	9,252	7549	30065 PACIFIC COAST HWY.	Malibu	Remedial grading and new water well	Open	
	1.53	8,072	7590	6943 GRASSWOOD AVE.	Malibu	Single Story Addition and Interior Remodel	Open	
	1.22	6,463	7734	6097 MURPHY WAY	Malibu	C of C for LLA	Open	
	0.69	3,619	7774	6150 ZUMIREZ DR.	Malibu	after the fact for fence, gate, and landscaping	Open	
	1.05	5,526	7989	6500 ZUMA VIEW PL	Malibu	ATF Guest House	Open	
	1.41	7,422	8014	6451 BUSCH DR.	Malibu	Clear PROW encroachments, create pathways and restricted parking	Open	
	0.81	4,301	8046	28916 WIGHT RD.	Malibu	Amend CDP to reduce the size and change footprint	Open	
	1.06	5,620	8074	29718 CUTHBERT RD.	Malibu	Convert garage & stable, and construct addition	Open	
	1.00	5,273	8336	29211 HEATHERCLIFF RD.	Malibu	Hours of Operation and Delivery Hours	Open	
	0.15	783	8331	5969 CAVALLERI RD.	Malibu	OWTS failure	Open	
	1.20	6,342	8375	6556 WANDERMERE RD.	Malibu	Remodel of (E) guest house and (E) barn	Open	
	1.09	5,779	8398	29249 HEATHERCLIFF RD.	Malibu	Demolish Southern California Edison substation	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.37	7,260	8410	6200 PORTERDALE DR.	Malibu	LLA between 6200 Porterdale (4467004037) and 6050 Murphy Way (4467004028), no development proposed	Open	
	0.22	1,152	8416	5942 CAVALLERI RD.	Malibu	ATF equestrian structures & retaining walls, demo barn & OWTS, (N) barn	Open	
	1.11	5,873	8418	6638 WILDLIFE RD.	Malibu	ATF front yard fence and gate	Open	
	0.99	5,230	8578	6208 DELAPLANE RD.	Malibu	ATF (N)OWTS, 4,600 sq ft addition, pool, basement, 2nd floor	Open	
	0.46	2,433	8604	28465 VIA ACERO ST.	Malibu	NSFR, guest house, pool	Open	
	1.95	10,289	8609	30544 MORNING VIEW DR.	Malibu	NSFR, NOWTS, tennis court	Open	
	1.94	10,223	8865	30532 MORNING VIEW DR.	Malibu	ATF landscaping	Open	
	1.23	6,499	8888	27950 WINDING WAY	Malibu	PVD	Open	
	0.96	5,073	9060	5723 BUSCH DR.	Malibu	N Water Tank	Open	
	1.97	10,394	9094	4877 LATIGO CANYON RD.	Malibu	Cert of Compliance	Open	
	1.23	6,472	9161	6728 WILDLIFE RD.	Malibu	NSFR, LLA and Landscaping	Open	
	1.71	9,055	9167	27467 CALICUT RD.	Malibu	108 Square Foot Addition, New Elevator	Open	
	1.76	9,301	9203	27543 PACIFIC COAST HWY.	Malibu	Ground Mounted Solar	Open	
	0.82	4,347	9223	6329 ZUMIREZ DR.	Malibu	NSFR, Landscaping, Pool	Open	
	0.83	4,357	9264	29051 PACIFIC COAST HWY.	Malibu	ATF - New fence, vehicular gate and resurfacing of driveway, approve boot-legged laundry room, remove second kitchen	Open	
	0.21	1,132	9268	6080 CAVALLERI RD.	Malibu	PVD	Open	
	1.78	9,394	9294	30378 MORNING VIEW DR.	Malibu	Ground mounted solar	Open	
	1.78	9,406	9312	27530 PACIFIC COAST HWY.	Malibu	Demo ESFR, NSFR	Open	
	1.12	5,914	9330	6075 MURPHY WAY	Malibu	NSFR/Attached garage and carport/Pool and Spa/Guesthouse	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.80	9,530	9454	27511 PACIFIC COAST HWY.	Malibu	Less than 50% demo, Polo Field, SFR interior and exterior remodel, Lot Line Adjustment	Open	
	1.77	9,347	9453	27529 PACIFIC COAST HWY.	Malibu	NSFR, OWTS, spa, retaining walls, polo field, barn and accessory structure	Open	
	1.37	7,235	9602	6415 BUSCH DR.	Malibu	Vineyard - After The Fact	Open	
	1.53	8,088	9664	6946 WILDLIFE RD.	Malibu	Stair repair to the beach	Open	
	1.22	6,454	9712	27865 WINDING WAY	Malibu	Lot Merger, Replacement Structure (more than 50% remodel), AOWTS, swimming pool, addition to SFR, remodel accessory structures	Open	
	1.84	9,703	9715	27420 CALICUT RD.	Malibu	NSFR, OWTS, Garage, landscaping, grading and decking	Open	
	0.53	2,818	9722	5750 RAMIREZ CANYON RD.	Malibu	Park Administrative Upgrade	Open	
	1.37	7,235	9789	6415 BUSCH DR.	Malibu	New pool,	Open	
	1.57	8,316	9887	6956 DUME DR.	Malibu	2nd story addition, remodel	Open	
	0.61	3,242	9957	5890 RAMIREZ CANYON RD.	Malibu	Lot merger (5812 5890) and single family house with basement, pool/spa, barn, AOWTS	Open	
	0.45	2,366	9974	5943 KANAN DUME RD.	Malibu	New 900 square foot greenhouse and vineyard	Open	
	0.88	4,660	9976	6363 ZUMIREZ DR.	Malibu	3,459 Square foot addition, new pool, decking and NOWTS	Open	
	1.21	6,389	9995	6295 MURPHY WAY	Malibu	Equestrian facility; 2 story stable 10,242 sf	Open	
	1.76	9,294	10023	27545 PACIFIC COAST HWY.	Malibu	Failed OWTS	Open	
	1.16	6,108	10057	5939 BUSCH DR.	Malibu	Demo SFR, (N) SFR and (N) OWTS	Open	
	1.76	9,288	10062	27547 PACIFIC COAST HWY.	Malibu	Remodel, addition, hardscaping	Open	
	1.76	9,294	10097	27545 PACIFIC COAST HWY.	Malibu	(N) AOWTS, barn, second unit, cabana, driveway, riding arena	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.23	6,482	10139	27935 WINDING WAY	Malibu	An application to demolish an existing Single-Family Residence (SFR) and build a new multi-level SFR with new pool and spa, landscaping, driveway, onsite wastewater treatment system, tennis court, fire access driveway, and hardscape and walkways througho	Open	
	1.91	10,088	10182	6325 MALIBU PARK LN	Malibu	Addition to an existing single family home, interior remodel, new alternate onsite wastewater treatment system, new pool & spa	Open	
	1.79	9,474	10201	30385 MORNING VIEW DR.	Malibu	NSFR, OWTS, pool, guest house, tennis court	Open	
	1.22	6,438	10234	6035 MURPHY WAY	Malibu	Interior remodel, addition of 360 square feet, grading/retaining walls, (N) pool and trellis	Open	
	1.27	6,716	10239	28000 SEA LANE DR.	Malibu	AOWTS, 2,000 sqft addition, and roof deck	Open	
	0.29	1,556	10246	28906 VERDE MESA LN	Malibu	NSFR, AOWTS, New Pool: Var for Stream ESHA buff & VAR for ESHA Buffer & Slopes; SPR for Height	Open	
	1.14	6,038	10253	6645 DUME DR.	Malibu	(N) OWTS, addition to (E) SFR and addition to (E) garage	Open	
	1.86	9,830	10260	29035 CLIFFSIDE DR.	Malibu	PVD	Open	
	1.62	8,580	10267	7022 GRASSWOOD AVE	Malibu	New pool and wood deck	Open	
	1.46	7,711	10287	6920 FERNHILL DR.	Malibu	Wireless Facility	Open	
	1.46	7,695	10283	29180 GRAYFOX ST.	Malibu	Wireless Facility	Open	
	0.27	1,444	10303	5716 KANAN DUME RD.	Malibu	N SFR, pool/spa, det. Garage, second unit, landscape/ hardscape	Open	
	1.21	6,386	10335	6708 WILDLIFE RD.	Malibu	NSFR w basement, guest house, pool/spa, ATF approval for LLA (1988-NO CDP but COCs issued by County)	Open	
	0.84	4,425	10362	5740 CALPINE DR.	Malibu	50 percent remodel,interior remodel, addition, roof line alteration, NAOWTS	Open	
	0.85	4,511	10402	5663 CALPINE DR.	Malibu	NAOWTS	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.52	8,041	10510	29807 BADEN PL	Malibu	Lot Merger with 29803 PCH	Open	
	1.54	8,112	10423	29803 BADEN PL	Malibu	Lot merger with 29807 Baden Place, new tennis court and landscaping	Open	
	1.97	10,394	10439	4877 LATIGO CANYON RD.	Malibu	(N) SFR, 3 car garage, swimming pool and spa	Open	
	1.22	6,443	10438	28929 BONIFACE DR.	Malibu	New guest house and OWTS	Open	
	1.40	7,414	10471	6837 ZUMIREZ DR.	Malibu	3 question Pre-App	Open	
	1.83	9,649	10474	28981 CLIFFSIDE DR.	Malibu	Amend CDP 14-014:New guest house and new landscape/hardscape	Open	
	0.46	2,433	10492	28405 VIA ACERO ST.	Malibu	NSFR, pool and spa, AOWTS	Open	
	1.35	7,153	10520	6815 DUME DR.	Malibu	385 square foot addition to the master bedroom and 136 square foot addition to the kitchen of an existing SFR	Open	
	1.58	8,332	10555	6419 MERRITT DR.	Malibu	Landscaping	Open	
	1.40	7,414	10553	6837 ZUMIREZ DR.	Malibu	Demo existing SFR, N SFR, pool, spa	Open	
	1.96	10,375	10546	29215 CLIFFSIDE DR.	Malibu	Interior remodel for existing second unit; conversion to guest house.	Open	
	1.76	9,271	10560	5901 PHILIP AVE.	Malibu	New SFR with SPR's for height and slopes (driveway)	Open	
	1.22	6,427	10559	6254 BUSCH DR.	Malibu	455 Square foot addition fo 1/4 Sfr, Interior remodel and deck extension	Open	
	1.27	6,716	10561	28000 SEA LANE DR.	Malibu	New Pool and Landscaping	Open	
	1.76	9,283	10579	6800 WESTWARD BEACH RD.	Malibu	New AOWTS	Open	
	1.93	10,168	10600	29140 CLIFFSIDE DR.	Malibu	Geo Pre App	Open	
	0.46	2,433	10602	28465 VIA ACERO ST.	Malibu	Water well	Open	
	1.50	7,946	10644	6935 GRASSWOOD AVE	Malibu	NSFR	Open	
	1.22	6,454	10650	27865 WINDING WAY	Malibu	COC for vacant lot	Open	
	0.47	2,490	10648	28283 VIA ACERO ST.	Malibu	Home workshop	Open	
	1.55	8,208	10677	6950 DUME DR.	Malibu	PVD	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.59	8,371	10695	30188 MORNING VIEW DR.	Malibu	314 sf extension of an existing deck (Lot has a deed restriction requiring CDP for all new development on property)	Open	
	1.11	5,873	10732	6638 WILDLIFE RD.	Malibu	Interior remodel	Open	
	0.96	5,064	10741	5849 MURPHY WAY	Malibu	NSFR	Open	
	0.78	4,108	10747	6431 KANAN DUME RD.	Malibu	SoCal Gas advanced meter	Open	
	1.35	7,118	10753	29958 HARVESTER RD.	Malibu	NSFR, detached garage, pool, remodel of guest house and barn	Open	
	1.20	6,360	10759	29201 LARKSPUR LN.	Malibu	Remodel, addition, pool/spa, landscaping	Open	
	1.06	5,597	10777	6701 PORTSHEAD RD.	Malibu	NSFR	Open	
	1.81	9,575	10808	28820 CLIFFSIDE DR.	Malibu	New Piles	Open	
	1.98	10,471	10820	30553 MORNING VIEW DR.	Malibu	Interior and exterior remodel to main house and pool house	Open	
	0.86	4,530	10829	6127 RAMIREZ CANYON RD.	Malibu	Lowering of rooflines, replacement of doors and windows, no new square footage.	Open	
	1.16	6,141	10832	5958 BUSCH DR.	Malibu	New trellis, gates, and enclosure of space below stairs to remedy code violation	Open	
	1.10	5,801	10867	6614 DUME DR.	Malibu	Roof mounted solar	Open	
	1.28	6,779	10883	5427 HORIZON DR.	Malibu	Interior Remodel and 827 SF First Addition	Open	
	0.70	3,710	10888	5970 RAMIREZ CANYON RD.	Malibu	New retaining wall and deck	Open	
	0.68	3,598	10903	6130 ZUMIREZ DR.	Malibu	Addition & Remodel	Open	
	1.08	5,716	10902	28834 SELFRIDGE DR.	Malibu	New Pool	Open	
	0.54	2,855	10906	6050 GALAHAD RD.	Malibu	PVD	Open	
	1.78	9,397	10908	29219 GREENWATER RD.	Malibu	Landscaping, hardscaping, new covered patio and irrigation system	Open	
	0.60	3,190	10909	6375 GAYTON PL	Malibu	Interior Remodel	Open	
	1.25	6,622	10917	28036 SEA LANE	Malibu	Landscape Only	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				DR.				
	1.20	6,318	10943	6420 DELAPLANE RD.	Malibu	Interior remodel, deck extension and landscaping	Open	
	1.27	6,716	10954	6749 WILDLIFE RD.	Malibu	Expand driveway, new walkway and entry steps, new pre fab spa and sauna	Open	
	1.38	7,306	10958	6254 PORTERDALE DR.	Malibu	PVD	Open	
	1.49	7,854	10959	30060 HARVESTER RD.	Malibu	Increase roof height, interior remodel, window and door replacement, re-side exterior, retrofit ex. Fireplace.	Open	
	1.01	5,320	10964	6464 RAMIREZ MESA DR.	Malibu	Underpin existing footings	Open	
	1.32	6,975	10973	29921 HARVESTER RD.	Malibu	Over 500 sq. ft. addition and remodel	Open	
	1.95	10,290	10976	30536 MORNING VIEW DR.	Malibu	Demo existing 7,196 sq. ft. tennis court slab.	Open	
	0.76	4,039	10982	6050 RAMIREZ CANYON RD.	Malibu	Certificate of Compliance	Open	
	0.73	3,829	10981	6038 RAMIREZ CANYON RD.	Malibu	Certificate of Compliance	Open	
	0.60	3,145	10998	6324 CAVALLERI RD.	Malibu	New generator	Open	
RIH	0.01	60	A0826657			FCC ASR California Granted Not Constructed		
	1.54	8,114	3718 Capitol Ave.	3718 Capitol Ave.	Industry	develop new 36,666 sf warehouse w/ office & mezzanine	ND/MND	application complete & env review ongoing
	0.99	5,206	12851 Crossroads Parkway S.	12851 Crossroads Parkway S.	Industry	Develop new 2-story, 77,250 sf office building	MND	application complete & env review ongoing
	0.01		LA County, 170' communication tower			Telecommunications tower/pole, FCC Reg.#1287222		
	1.96		SCE Mesa 500-kV Substation Project			New telecommunications lines and modifications to an existing line		
	0.15		SCE Tehachapi Renewable			Transmission line project		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
			Transmission Line Project					
SDW	0.42	2,231	Bel Vintage single-family	Via Verde and S. San Dimas Ave.	San Dimas	9 two-story SFR in Bel Vintage Community		under construction
	1.69	8,902	CUP 2522-2015, ENV 2523-2015	3423 Pomona Blvd.	Pomona	Demo 4,000 sf retail building & construct 2,100 sf Starbucks		
	1.89	9,999	CUP 12-001-Appeal, VAR 12-002	1700 Gillette Rd.	Pomona	CUP to construct 6-story 105-room hotel (Hampton Inn)		
	1.99	10,497	MCUP 14-003	3111 Temple Ave.	Pomona	Provide convenience store at existing gas station/car wash		
	1.89	10,003	WIRE 2501-2015	3179 W. Temple Ave.	Pomona	modify Verizon Wireless monopole		
	1.96	10,325	CUP 12-012	22122 Valley Blvd.	Pomona	construct 5 industrial buildings on 6.34 ac property		
SGH	1.56	8,231	A0936671		Long Beach	FCC ASR California Granted Not Constructed		
	1.81	9,551	A0907331		Lakewood	FCC ASR California Granted Not Constructed		
	1.15	6,076	A0868154		Long Beach	FCC ASR California Granted Not Constructed		
	0.54	2,843	1939 Temple Ave.	1939 Temple Ave.	Signal Hill	Develop 10 condo units (5 buildings w/ 2 attached units)	in review	
	0.67	3,514	2599 Pacific Coast Highway	2599 Pacific Coast Hwy.	Signal Hill	Residential condo concept plan has 9 units	condo map submittal is pending	
	0.58	3,067	Gundry Hill	1500 E. Hill St.	Signal Hill	Develop of 72 multi-family units & a community building, garden, etc.	in plan check	
	0.57	3,015	Crescent Square	2500 Walnut Ave.	Signal Hill	25 3-story detached SFR	awaiting submittal for plan check	
	0.53	2,790	2085 Freeman Ave.	2085 Freeman Ave.	Signal Hill	new 2-story 3,746 sf SFD w/ garage	plans for a PC workshop	
	0.54	2,828	2260 Walnut Ave.	2260 Walnut Ave.	Signal Hill	new 2-story 1,894 sf SFD w/ garage	plans for a PC workshop	
	0.48	2,517	1995 St. Louis Ave.	1995 St. Louis Ave.	Signal Hill	Demo dwelling & garage & construct 2-story SFR w/ garage	in SPDR	
	1.46	7,707	3347 Brayton Ave.	3347 Brayton Ave.	Signal Hill	remodel front of SFD for addition and new garage	in SPDR	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.57	8,279	3360 Lemon Ave.	3360 Lemon Ave.	Signal Hill	1,207 sf 2nd unit over a 4-car garage at rear of property w/ SFD	in SPDR	
	1.12	5,908	924 E. Vernon St.	924 E. Vernon St.	Signal Hill	Demo dwelling & garage & construct 2-story duplex w/ garage	ready for permit issuance	
	0.24	1,284	2311 Ocean View	2311 Ocean View	Signal Hill	add/expand second story decks & "trainhouse" to SFR	under construction	
	0.27	1,449	2451 Avis Ct.	2451 Avis Ct.	Signal Hill	200 sf addition of 1 bedroom & bathroom	under construction	
	0.34	1,795	2518 Willow St.	2518 Willow St.	Signal Hill	New front gate & update guard shack	ready for permit issuance	
	0.50	2,653	2477 Gaviota Ave.	2477 Gaviota Ave.	Signal Hill	rehab of SFR & new 2-car garage	under construction	
	1.41	7,469	3240 Cerritos Ave.	3240 Cerritos Ave.	Signal Hill	interior drywall, plumbing & electrical for existing house	under construction	
	0.42	2,231	1790 E. Burnett St.	1790 E. Burnett St.	Signal Hill	Renovate existing house & construct new garage	under construction	
	0.97	5,124	2357 Lewis Ave.	2357 Lewis Ave.	Signal Hill	repair a fire damaged SFR	Completed	
	0.50	2,647	2953 Obispo Ave.	2953 Obispo Ave.	Signal Hill	allow indoor soccer as a conditionally permitted use in the City	Request postponed	
	1.15	6,069	4201 East Willow Street	4201 East Willow St.	Long Beach	new mixed-use development w/ retail, car wash & parking	MND	
	0.91	4,825	3800 East Willow Street	3800 East Willow St.	Long Beach	transfer property to the Long Beach East Division Police Substation	IS/MND	
	1.15		SBA Monarch Towers II, LLC			65' telecommunications tower, FCC Reg. #1274798		
	1.81		LA SMSA Limited Partnership, 38' communication tower			Telecommunications tower/pole, FCC Reg.#1293976		
	1.59		LA SMSA Limited Partnership, 60' communication tower			Telecommunications tower/pole, FCC Reg.# 1295611		
SIM	1.97	10,409	LA-RICS: MLE	3800 Mountain Lee Dr.	Los Angeles	LA-RICS LMR: STATEX 1		
	0.84	4,434	3599 Lankershim Blvd.	3599 Lankershim Blvd.	Los Angeles	3599 Lankershim Blvd.		
	1.67	8,839	6300 Forest Lawn Dr.	6300 Forest Lawn Dr.	Los Angeles	6300 Forest Lawn Dr.		
	0.26	1,370	100 Universal City Plaza	100 Universal City Plaza	Universal City	100 Universal City Plaza		

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.87	9,879	2500-2551 Leicester	2500 Leicester	Los Angeles	2500-2551 Leicester		
	1.91	10,090	2500-2548 Thames	2500 Thames	Los Angeles	2500-2548 Thames		
	1.89	9,964	2500-2529 N. Woodstock	2500 N. Woodstock	Los Angeles	2500-2529 N. Woodstock		
	0.66	3,473	231 S. Valley St.	231 S. Valley St.	Burbank	Special Development Permit for demo and new home	submitted	
	0.71	3,752	102 S. Valley St.	102 S. Valley St.	Burbank	Demo SFR & construct new 4,330 sf house	in process	
	1.95	10,318	1134 N. Valley St.	1134 N. Valley St.	Burbank	Current Planning	submitted	
	1.02	5,401	4009 Riverside Dr.	4009 Riverside Dr.	Burbank	Restaurant TI	submitted	
	1.03	5,461	4005 Riverside Dr.	4005 Riverside Dr.	Burbank	Allow sit-down restaurant in MDC-3	in process	
	1.04	5,498	4001 Riverside Dr.	4001 Riverside Dr.	Burbank	AUP to allow a sit-down restaurant in MDC-3	in process	
	1.67	8,840	846 N. Pass Ave.	846 N. Pass Ave.	Burbank	Special Development Permit for new 2,664 sf house	submitted	
	1.39	7,314	3401 W. Olive Ave.	3401 W. Olive Ave.	Burbank	PD of 241 residential units above grocery store	approved	
	1.26	6,651	215 N. Hollywood Way	215 N. Hollywood Way	Burbank	Construct 3,350 sf SFR in MDR-4 zone	in process	
	1.62	8,554	831 Evergreen St.	831 Evergreen St.	Burbank	Single Family Special Development Permit to construct new SFR 2,772 sf	in process	
	1.88	9,909	500 S. Buena Vista St.	500 S. Buena Vista St.	Burbank	DA Amendment to extend Disney development agreement	in process	
SUN	0.23	1,192	A0906786			FCC ASR California Granted Not Constructed		
	0.22		Ellis communications KDOC Licensee, LLC, 220' communication tower			Telecommunications tower, FCC Reg.# 1015693		
SUN2	0.22	1,141	A0906786			FCC ASR California Granted Not Constructed		
	0.21		Ellis communications KDOC Licensee, LLC, 220' communication tower			Telecommunications tower, FCC Reg.# 1015693		
TMT	1.33	7,019	LA-RICS: LBR	Angeles National Forest - 3N06.1 E. Blue Ridge Rd. and Wright Mountain	Unincorporated	LA-RICS LMR: STATEX 2		

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
TOP	1.91	10,096	Calabasas Peak Motorway Residences	Calabasas Peak Motorway	Calabasas	4 individual SFR on 4 parcels, installation of a Waterworks District 29 tank, road & trail widening improvements	NOP - EIR	
VPK	1.25	6,594	8000 La Tuna Canyon Rd.	8000 La Tuna Canyon Rd.	Los Angeles	8000 La Tuna Canyon Rd.		
	1.95	10,280	1071 E. Angeleno Ave.	1071 E. Angeleno Ave.	Burbank	FAR Increase	approved	
	1.29	6,808	6433 La Tuna Canyon Rd.	6433 La Tuna Canyon Rd.	Tujunga	6433 La Tuna Canyon Rd.		
WAD	1.76	9,310	LA-RICS: WHD	Lat/Long coordinates only	West Hollywood	LA-RICS: PSBN_LTE CAP_Plan_COW Sites 11_17_2015.xlsx	Completed	Completed
	1.25	6,585	2500-2551 Leicester	2500 Leicester	Los Angeles	2500-2551 Leicester		
	1.19	6,273	2500-2548 Thames	2500 Thames	Los Angeles	2500-2548 Thames		
	1.25	6,611	2500-2529 N. Woodstock	2500 N. Woodstock	Los Angeles	2500-2529 N. Woodstock		
	1.62	8,551	8150 W. Sunset Boulevard	8150 W. Sunset Blvd.	Los Angeles	8150 W. Sunset Boulevard		
	1.77	9,333	City Hall Parking Structure	8300 Santa Monica Blvd.	West Hollywood	construct 200-space automated parking garage w/ plaza & entry service area	under construction	
	1.33	7,024	Billboard Project	9015 Sunset Blvd.	West Hollywood	remove roof-mounted sign & install new freestanding, double-sided billboard atop new pole	IS/MND	
	1.62	8,551	Mixed-Use Project - City of LA	8150 Sunset Blvd.	West Hollywood	Redevelop 2.56 acres w/ mixed-use residential & retail	EIR	
	1.76	9,270	Avenues Streetscape Master Plan	Almont Dr. and La Peer Dr.	West Hollywood	plan to improve the aesthetics and mobility of commercial district	ND	
	1.64	8,654	Mixed-Use Project	8555 Santa Monica Blvd.	West Hollywood	new 5-story building w/ apartments, restaurant, and retail uses.	Draft EIR	
	1.37	7,239	Off-Site Signage Study	Sunset Blvd.	West Hollywood	comprehensive evaluation of economic, urban design, land use & technological aspects of off-site advertising		
	1.36	7,193	Mixed-Use Project	8497 Sunset Blvd.	West Hollywood	construct 5-level, 28,139 sf mixed-use building & parking	IS/MND	
1.93	10,165	SMB20 project	8120 Santa Monica Blvd.	West Hollywood	demo commercial buildings, construct 35,975 sf mixed-use development	Final EIR		

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.92	10,157	Melrose Triangle Project	9040 Santa Monica Blvd.	West Hollywood	Proposed mixed-use commercial & residential project	EIR	
	1.66	8,779	San Vicente Inn	850 N. San Vicente Blvd.	West Hollywood	rehab of an urban inn & demo of existing buildings	IS/ND	
	1.65	8,732	Sprouts	8550 Santa Monica Blvd.	West Hollywood	Construct new commercial building	EIR	
	1.55	8,166	Tall Wall project	8228 Sunset Blvd.	West Hollywood	install new tall wall sign with lighting on existing building	MND	
	1.37	7,239	Creative Off-Site Signs	8755 Sunset Blvd.	West Hollywood	design and construction of offsite advertising sign		
	1.30	6,841	406 Robert Lane	406 Robert Ln.	Beverly Hills	Tree Removal Permit	in review	
	1.96	10,365	1010 N. Rexford Dr.	1010 N. Rexford Dr.	Beverly Hills	Central R-1 permit: new accessory structure	correcting	
	1.95	10,306	1011 Lexington Rd.	1011 Lexington Rd.	Beverly Hills	Zone Text Amendment - permit ramping over driveway	under review	
WS1	0.01	37	A0594445		Santa Monica	FCC ASR California Granted Not Constructed		
	1.91	10,068	A0533601		Santa Monica	FCC ASR California Granted Not Constructed		
	0.46	2,405	Santa Monica Mountains North Area Plan	Mulholland Hwy. and Old Topanga Canyon Rd.	Santa Monica	Amendment to County Code to define as a use, require a CUP & establish development standards for vineyards		
	0.60	3,173	Hidden Terraces Specific Plan	Mureau Rd.	Santa Monica	creation of 2 parcels w/ adult residential facility building w/in each parcel (total 258 units & 5 suites).	NOP - EIR	
	0.46	2,405	Santa Monica Mountains North Area Community Standards District	Santa Monica	Santa Monica			
	0.46	2,405	Local Coastal Program	Santa Monica	Santa Monica	Land Use Plan & Local Implementation Plan		
	0.45	2,376	Hotel	710 Wilshire Blvd.	Santa Monica	Adaptive re-use of a Landmark building into a mixed-use hotel/retail project	Approved	
	0.45	2,388	Mixed-Use Apartments	702 Arizona Ave.	Santa Monica	Mixed use commercial/residential	Approved	
	0.58	3,051	Hampton Inn & Suites by Hilton	501 Colorado Ave.	Santa Monica	new 6-story hotel w/ parking	Approved	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.94	4,947	CCSM Affordable Housing Project	430 Pico Blvd.	Santa Monica	new 3-story housing project w/ subterranean parking	Approved	
	0.87	4,575	Back on the Beach	415 Palisades Beach Rd.	Santa Monica	CUP for restaurant at Annenberg Community Beach House site	Approved	
	0.60	3,173	DA Modification	401 BRd.way	Santa Monica	to permit subterranean parking spaces on 2-levels	Approved	
	1.95	10,310	3204 Lincoln Boulevard	3204 Lincoln Blvd.	Santa Monica	2-story building w/ 10 on-site parking spaces	Approved	
	0.51	2,713	Macerich Cinemas	315 Colorado Ave.	Santa Monica	Convert vacant retail space into a movie theater	Approved	
	1.82	9,633	2913 10th Street	2913 10th St.	Santa Monica	attached 2-story multi-family development w/ garages & decks	Approved	
	1.92	10,160	2624 Arizona Avenue	2624 Arizona Ave.	Santa Monica	fence & wall height modification to legalize an existing fence	Approved	
	0.60	3,173	Yahoo (Colorado) Center Development	2500 BRd.way	Santa Monica	revise base parking ratio for office use on the site	Approved	
	0.53	2,792	250 Santa Monica Pier	250 Santa Monica Pier	Santa Monica	Zoning Text Amendment request to allow roof deck accessory uses	Approved	
	1.86	9,845	Pico Neighborhood Library	2200 Virginia Ave.	Santa Monica	new 1-story library	Approved	
	0.89	4,705	DA	1901 Main St.	Santa Monica		Approved	
	0.76	4,003	RAND DA Amendment	1776 Main St.	Santa Monica	Convert 18,216 sf of parking into primarily offices	Approved	
	1.59	8,397	Crossroads School Science Building	1731 20th St.	Santa Monica	New 3-story science learning center & temp modular classrooms	Approved	
	1.94	10,217	AA/Pen Factory or Bergamot Transit Village Center	1681 26th St.	Santa Monica	add 7,499 sf to building & adaptive re-use of vacant building for creative office space	Approved	
	1.89	9,970	Wireless Telcom Facility	1602 Ocean Park Blvd.	Santa Monica	new AT&T Mobility Wireless Telecommunication Facility on rooftop of single story building	Approved	
	0.67	3,553	Mixed-Use Building	1560 Lincoln Blvd.	Santa Monica	New 5-story mixed-use building w/ 100 units & commercial space	Approved	
	0.55	2,904	Courtyard by Marriott Hotel	1554 5th St.	Santa Monica	new 6-story hotel w/ parking	Approved	
	1.01	5,341	Mini Dealership	1402 Santa Monica Blvd.	Santa Monica	New 2-story building for car dealership	Approved	
	1.35	7,152	1347 19th Street	1347 19th St.	Santa Monica	construct 2-story mixed-use building w/ office space & studio units	Approved	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.55	8,187	St. John's Health Center Development	1328 22nd St.	Santa Monica	Implement a parking program and construct a Modified Entry Plaza	Approved	
	0.16	845	Mixed-Use Project	1318 2nd St.	Santa Monica	Mixed use commercial/residential	Approved	
	0.46	2,415	Mixed-Use Apartments	1317 7th St.	Santa Monica	5-story residential/commercial building	Approved	
	1.25	6,593	DA	1112 Pico Blvd.	Santa Monica	New 32-unit residential project	Approved	
	1.76	9,289	802 Ashland Avenue	802 Ashland Ave.	Santa Monica	10-unit apartment building w/ 20 parking spaces	Pending	
	0.70	3,700	701 Marine Street	701 Marine St.	Santa Monica	fence & wall height modification to legalize an existing fence	Pending	
	0.38	2,019	603 Arizona Avenue	603 Arizona Ave.	Santa Monica	7-story hotel w/ restaurant & subterranean parking	Pending	
	0.61	3,215	601 Colorado Avenue	601 Colorado Ave.	Santa Monica	new 6-story mixed use building	Pending	
	0.96	5,049	Le Meridien Delfina Hotel DA Amendment	530 Pico Blvd.	Santa Monica	to allow parking changes, valet parking, augment TDM efforts	Pending	
	0.59	3,139	DA	525 Colorado Ave.	Santa Monica	Mixed-use project w/ residential, commercial & mechanical parking spaces	Pending	
	0.60	3,173	DA	501 BRd.way	Santa Monica	Mixed-use project w/ residential, commercial & subterranean parking spaces	Pending	
	0.60	3,173	5th and Broadway	500 BRd.way	Santa Monica	new 7-story commercial & residential building w/ parking	Pending	
	1.79	9,446	3100 Main Street	3100 Main St.	Santa Monica	Wireless Telecom Facility on roof	Pending	
	1.02	5,389	Rear Setback Variance	237 Palisades Beach Rd.	Santa Monica	Rear yard setback variance to allow a deck to encroach into the rear yard	Pending	
	0.89	4,699	Mixed-Use Project	234 Pico Blvd.	Santa Monica	New 4-story mixed-use residential & commercial project	Pending	
	1.34	7,056	American Tire Depot	2311 Lincoln Blvd.	Santa Monica	CUP to modify a legal non-conforming auto repair facility	Pending	
	1.63	8,583	Mixed Use	2300 Wilshire Blvd.	Santa Monica	Construct 3-story mixed-use building w/ subterranean parking	Pending	
	1.54	8,138	Providence SJHC S. Campus Master Plan/PSJHC Phase II	2121 Santa Monica Blvd.	Santa Monica	Master Plan for the development of hospital and related facilities	Pending	
	1.57	8,267	Mixed-Use Commercial	2041 Colorado Ave.	Santa Monica	4-story mixed-use building w/ residential, commercial and parking	Pending	
	1.81	9,538	Virginia Townhomes	2002 21st St.	Santa Monica	2-story townhomes w/ parking	Pending	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.74	9,182	1900 Pico Boulevard	1900 Pico Blvd.	Santa Monica	New wireless communications facility on building	Pending	
	1.31	6,904	Mixed-Use Project	1802 Santa Monica Blvd.	Santa Monica	new 3-story mixed-use project w/ residential, auto dealership, restaurant	Pending	
	0.80	4,200	Lincoln Blvd Development Agreement	1660 Lincoln Blvd.	Santa Monica	6-story building w/ residential units, parking, and commercial	Pending	
	0.78	4,106	Lincoln Blvd Development Agreement	1650 Lincoln Blvd.	Santa Monica	6-story building w/ residential units, parking, and commercial	Pending	
	0.78	4,107	Lincoln Collection	1641 Lincoln Blvd.	Santa Monica	new 5-story, 78-unit, mixed-use building	Pending	
	0.76	3,993	Lincoln Collection	1637 Lincoln Blvd.	Santa Monica	new 5-story, 75-unit, mixed-use building	Pending	
	0.74	3,904	Lincoln Collection	1613 Lincoln Blvd.	Santa Monica	new 5-story, 56-unit, mixed-use building	Pending	
	0.72	3,825	Lincoln Collection	1601 Lincoln Blvd.	Santa Monica	new 5-story, 90-unit, mixed-use building	Pending	
	1.12	5,911	Toyota Dealership	1530 Santa Monica Blvd.	Santa Monica	2-story building	Pending	
	0.60	3,146	LUXE / Mixed-Use Project	1441 Lincoln Blvd.	Santa Monica	6-story, 60-unit mixed-use project w/ commercial & subterranean parking	Pending	
	0.42	2,244	1437 5th Street	1437 5th St.	Santa Monica	Affordable housing & commercial mixed-use project	Pending	
	1.13	5,949	Colorado at 15th Street	1431 Colorado Ave.	Santa Monica	new mixed-use development w/ 50 residential units	Pending	
	0.41	2,161	1425 5th Street	1425 5th St.	Santa Monica	Proposed 100 residential unit building	Pending	
	0.40	2,097	Mixed Use Residential	1415 5th St.	Santa Monica	New mixed use building w/ residential/commercial	Pending	
	0.39	2,033	Mixed Use Residential	1325 6th St.	Santa Monica	Mixed use 7-story building w/ commercial/apartments	Pending	
	0.53	2,783	Mixed Use Residential	1318 Lincoln Blvd.	Santa Monica	New mixed-use, 6-story, 60-unit building	Pending	
	0.26	1,354	Arclight Cinemas	1318 4th St.	Santa Monica	construct new movie theater/retail-restaurant	Pending	
	0.25	1,297	5th & Arizona Project	1301 4th St.	Santa Monica	Mixed use office/hotel/residential/cultural/retail	Pending	
	0.43	2,278	1238 7th Street	1238 7th St.	Santa Monica	5-story housing building	Pending	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.29	1,505	1235 5th Street	1235 5th St.	Santa Monica	New 5-story residential/restaurant/retail building	Pending	
	0.81	4,270	Turtle Villas	1211 12th St.	Santa Monica	3-story, 13-unit residential building w/ parking	Pending	
	0.50	2,638	Hotel Project by the Pier	120 Colorado Ave.	Santa Monica	Redevelop existing Wyndham Hotel	Pending	
	0.51	2,682	1143 - 1443 Lincoln Boulevard	1143 Lincoln Blvd.	Santa Monica	6-story building w/ 60 residential units & parking	Pending	
	0.88	4,670	1134 Euclid Street	1134 Euclid St.	Santa Monica	6-unit condo over subterranean garage	Pending	
	0.03	177	Miramar Hotel Mixed-Use Project	101 Wilshire Blvd. & 1133 Ocean Ave.	Santa Monica	Redevelopment of hotel site with retail, event facilities & housing	Pending	
	0.79	4,183	New Acute Rehabilitation Center	1131 Arizona Ave.	Santa Monica	replace 1-story facility w/ a 3-story, 55 bed facility	Pending	
	1.25	6,596	1038 Bay Street	1038 Bay St.	Santa Monica	2-story attached duplex w/ courtyards, parking & a roof deck	Pending	
	0.24	1,256	Ocean Avenue Project	101 Santa Monica Blvd.	Santa Monica	New mixed-use hotel, cultural, retail & residential development	Pending	
	0.97	5,101	Santa Monica CA Incline Replacement Project	1100 Pacific Coast Hwy.	Santa Monica	replace the CA Incline structure	under construction?	
	1.95		Southern California Disposal Co. Inc., 107' communication tower			Telecommunication tower, FCC Reg.# 1256562		
	0.10		MediaFLO USA Inc., 333' communication tower			Telecommunication tower, FCC Reg.# 1263391		
ZHQ	1.42	7,509	395	6316 CAVALLERI RD.	Malibu	Addition to SFR/Interior remodel	Open	
	1.55	8,198	8697	6120 CAVALLERI RD.	Malibu	PVD conducted in response to 28918 Verde Mesa Lane	Open	
	1.45	7,631	2164	6387 ZUMA MESA DR.	Malibu	NSFR	Open	
	1.45	7,660	2163	6397 ZUMA MESA DR.	Malibu	NSFR	Open	
	1.27	6,690	2844	30001 ZENITH POINT RD.	Malibu	CE* Int. Rem., Raise Roofline, Inc deck size	Open	
	1.14	6,043	2863	6304 SEA STAR DR.	Malibu	NSFR attached garage, Pool/SPA	Open	
	0.59	3,123	3337	6130 VIA CABRILLO ST.	Malibu	OWTS follow up to ECDP 05-065	Open	

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Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.97	5,118	3383	29458 BLUEWATER RD.	Malibu	Int Remodel and change roof line 24' to 28'	Open	
	0.71	3,755	3517	6246 SEADRIFT COVE	Malibu	Add to ESFR, NOWTS, Heights over 18'	Open	
	1.64	8,643	3559	6140 GALAHAD RD.	Malibu	NSFR, NOWTS, Bsmnt, Heights over 18'	Open	
	1.16	6,144	3621	6270 SEA STAR DR.	Malibu	NSFR, pool, spa, NOWTS	Open	
	1.11	5,840	3620	6398 SEA STAR DR.	Malibu	NSFR, NOWTS, Pool/Spa, Heights over 18'	Open	
	1.16	6,144	3619	6282 SEA STAR DR.	Malibu	NSFR, NOWTS, pool/spa, heights over 18'	Open	
	0.84	4,429	3816	5763 BUSCH DR.	Malibu	After the Fact Add to ESFR 184 Sq. Ft.	Open	
	0.84	4,429	3890	5763 BUSCH DR.	Malibu	New Pool	Open	
	0.30	1,606	3948	30050 PACIFIC COAST HWY.	Malibu	NOWTS Restrooms 3,4,5	Open	
	1.39	7,318	3957	6459 KANAN DUME RD.	Malibu	Piranah OWTS Follow up to ECDP	Open	
	0.73	3,831	4122	5936 FILAREE HEIGHTS RD.	Malibu	Add to ESFR; Landscaping	Open	
	0.89	4,726	4844	29255 HEATHERCLIFF RD.	Malibu	New 3-unit condo bldg, NAOWTS, sub garage, hardscape, LCPA for zone discrepancy	Open	
	1.29	6,818	5028	7050 DUME DR.	Malibu	Demo ESFR Construc NSFR & other	Open	
	0.99	5,249	5413	29169 HEATHERCLIFF RD.	Malibu	New Restaurant - Village Caf -- & Tenant Improvements	Open	
	1.52	8,009	5431	30924 BROAD BEACH RD.	Malibu	Rmdl & add to ESFR, NAOWTS, decking, hardscape	Open	
	0.94	4,961	5844	6579 WANDERMERE RD.	Malibu	*CE* ATF 700 sq. ft. studio	Open	
	1.35	7,139	5879	28955 PACIFIC COAST HWY.	Malibu	Replace Stairs with Elevator; Construct New Exterior Stairs	Open	
	1.56	8,249	6028	6851 FERNHILL DR.	Malibu	LLA - 2 adj parcels, no new development	Open	
	1.01	5,322	6075	29201 LARKSPUR LN.	Malibu	New Pool/Spa	Open	
	1.51	7,968	6095	28834 SELFRIDGE DR.	Malibu	Add to ESFR, Npool, outdoor work	Open	
	1.28	6,733	6259	6315 GAYTON PL	Malibu	Relocate OWTS, N Pool/Spa	Open	
	1.70	8,994	6260	28899 GRAYFOX	Malibu	*CE* Landscaping Slope Repair	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				ST.				
	1.26	6,673	6594	6341 GAYTON PL	Malibu	NOWTS & Int Remodel & Add to ESFR	Open	
	0.57	3,007	7079	29500 PACIFIC COAST HWY.	Malibu	Replace existing cabinet with a pedestal (wireless)	Open	
	1.55	8,171	7300	6155 PASEO CANYON DR.	Malibu	addition, int. remodel, and new pool and spa	Open	
	1.43	7,556	7530	6241 FRONDOSA DR.	Malibu	Enclose (E) patio - 95 square feet	Open	
	0.28	1,483	7549	30065 PACIFIC COAST HWY.	Malibu	Remedial grading and new water well	Open	
	1.36	7,172	7590	6943 GRASSWOOD AVE.	Malibu	Single Story Addition and Interior Remodel	Open	
	1.86	9,847	7774	6150 ZUMIREZ DR.	Malibu	after the fact for fence, gate, and landscaping	Open	
	1.42	7,489	7812	30846 BROAD BEACH RD.	Malibu	Addition to existing garage/guest house	Open	
	1.79	9,439	7873	6450 LUNITA RD.	Malibu	PVD-Ordinance	Open	
	1.89	9,991	7989	6500 ZUMA VIEW PL	Malibu	ATF Guest House	Open	
	0.43	2,293	8014	6451 BUSCH DR.	Malibu	Clear PROW encroachments, create pathways and restricted parking	Open	
	1.86	9,824	8011	6404 LUNITA RD.	Malibu	PVD	Open	
	1.48	7,839	8046	28916 WIGHT RD.	Malibu	Amend CDP to reduce the size and change footprint	Open	
	1.02	5,411	8074	29718 CUTHBERT RD.	Malibu	Convert garage & stable, and construct addition	Open	
	1.33	7,026	8275	30710 BROAD BEACH RD.	Malibu	Broad Beach Restoration Project Consolidated CDP	Open	
	0.97	5,119	8336	29211 HEATHERCLIFF RD.	Malibu	Hours of Operation and Delivery Hours	Open	
	1.74	9,188	8331	5969 CAVALLERI RD.	Malibu	OWTS failure	Open	
	0.94	4,958	8375	6556 WANDERMERE RD.	Malibu	Remodel of (E) guest house and (E) barn	Open	
	0.91	4,807	8398	29249 HEATHERCLIFF RD.	Malibu	Demolish Southern California Edison substation	Open	
	1.82	9,596	8416	5942 CAVALLERI RD.	Malibu	ATF equestrian structures & retaining walls, demo barn & OWTS, (N) barn	Open	
	1.59	8,415	8418	6638 WILDLIFE RD.	Malibu	ATF front yard fence and gate	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	0.93	4,932	8609	30544 MORNING VIEW DR.	Malibu	NSFR, NOWTS, tennis court	Open	
	0.92	4,834	8865	30532 MORNING VIEW DR.	Malibu	ATF landscaping	Open	
	1.58	8,342	8938	30999 PACIFIC COAST HWY.	Malibu	TTM LCPA, 62 Unit Development, Ballfield, Package Treatment Plant	Open	
	0.92	4,860	9060	5723 BUSCH DR.	Malibu	N Water Tank	Open	
	1.67	8,815	9161	6728 WILDLIFE RD.	Malibu	NSFR, LLA and Landscaping	Open	
	1.82	9,615	9223	6329 ZUMIREZ DR.	Malibu	NSFR, Landscaping, Pool	Open	
	1.17	6,190	9264	29051 PACIFIC COAST HWY.	Malibu	ATF - New fence, vehicular gate and resurfacing of driveway, approve boot-legged laundry room, remove second kitchen	Open	
	1.60	8,431	9268	6080 CAVALLERI RD.	Malibu	PVD	Open	
	0.67	3,512	9294	30378 MORNING VIEW DR.	Malibu	Ground mounted solar	Open	
	0.44	2,343	9602	6415 BUSCH DR.	Malibu	Vineyard - After The Fact	Open	
	1.91	10,062	9664	6946 WILDLIFE RD.	Malibu	Stair repair to the beach	Open	
	1.64	8,675	9714	31012 BROAD BEACH RD.	Malibu	Addition over 10% to SFR, and addition to E Garage.	Open	
	0.44	2,343	9789	6415 BUSCH DR.	Malibu	New pool,	Open	
	1.89	9,977	9869	31224 BROAD BEACH RD.	Malibu	Demo existing SFR and NSFR with garage, pool, spa, and owts	Open	
	1.24	6,524	9887	6956 DUME DR.	Malibu	2nd story addition, remodel	Open	
	1.69	8,913	9974	5943 KANAN DUME RD.	Malibu	New 900 square foot greenhouse and vineyard	Open	
	1.79	9,437	9976	6363 ZUMIREZ DR.	Malibu	3,459 Square foot addition, new pool, decking and NOWTS	Open	
	0.65	3,443	10057	5939 BUSCH DR.	Malibu	Demo SFR, (N) SFR and (N) OWTS	Open	
	1.72	9,084	10127	6128 TAPIA DR.	Malibu	New Deck over garage and interior remodel	Open	
	0.80	4,223	10182	6325 MALIBU PARK LN	Malibu	Addition to an existing single family home, interior remodel, new alternate onsite wastewater treatment system, new pool & spa	Open	
	0.70	3,683	10201	30385 MORNING VIEW DR.	Malibu	NSFR, OWTS, pool, guest house, tennis court	Open	
	1.39	7,348	10247	30811 PACIFIC	Malibu	Access to project site	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
				COAST HWY.				
	1.58	8,350	10246	28906 VERDE MESA LN	Malibu	NSFR, AOWTS, New Pool: Var for Stream ESHA buff & VAR for ESHA Buffer & Slopes; SPR for Height	Open	
	1.12	5,907	10253	6645 DUME DR.	Malibu	(N) OWTS, addition to (E) SFR and addition to (E) garage	Open	
	1.60	8,456	10260	29035 CLIFFSIDE DR.	Malibu	PVD	Open	
	1.40	7,398	10267	7022 GRASSWOOD AVE	Malibu	New pool and wood deck	Open	
	1.53	8,075	10287	6920 FERNHILL DR.	Malibu	Wireless Facility	Open	
	1.22	6,439	10283	29180 GRAYFOX ST.	Malibu	Wireless Facility	Open	
	1.46	7,716	10291	7361 BIRDVIEW AVE.	Malibu	Wireless Facility	Open	
	1.90	10,013	10303	5716 KANAN DUME RD.	Malibu	N SFR, pool/spa, det. Garage, second unit, landscape/ hardscape	Open	
	1.66	8,758	10335	6708 WILDLIFE RD.	Malibu	NSFR w basement, guest house, pool/spa, ATF approval for LLA (1988-NO CDP but COCs issued by County)	Open	
	0.95	5,016	10362	5740 CALPINE DR.	Malibu	50 percent remodel, interior remodel, addition, roof line alteration, NAOWTS	Open	
	1.62	8,546	10372	30980 BROAD BEACH RD.	Malibu	NSFR, N OWTS, N pool, spa, deck	Open	
	1.02	5,384	10402	5663 CALPINE DR.	Malibu	NAOWTS	Open	
	0.20	1,061	10510	29807 BADEN PL	Malibu	Lot Merger with 29803 PCH	Open	
	0.19	998	10423	29803 BADEN PL	Malibu	Lot merger with 29807 Baden Place, new tennis court and landscaping	Open	
	1.40	7,409	10438	28929 BONIFACE DR.	Malibu	New guest house and OWTS	Open	
	1.98	10,470	10471	6837 ZUMIREZ DR.	Malibu	3 question Pre-App	Open	
	1.67	8,828	10474	28981 CLIFFSIDE DR.	Malibu	Amend CDP 14-014: New guest house and new landscape/hardscape	Open	
	1.18	6,227	10520	6815 DUME DR.	Malibu	385 square foot addition to the master bedroom and 136 square foot addition to the kitchen of an existing SFR	Open	
	0.16	862	10555	6419 MERRITT DR.	Malibu	Landscaping	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.98	10,470	10553	6837 ZUMIREZ DR.	Malibu	Demo existing SFR, N SFR, pool, spa	Open	
	1.52	8,017	10546	29215 CLIFFSIDE DR.	Malibu	Interior remodel for existing second unit; conversion to guest house.	Open	
	1.00	5,284	10560	5901 PHILIP AVE.	Malibu	New SFR with SPR's for height and slopes (driveway)	Open	
	0.55	2,883	10559	6254 BUSCH DR.	Malibu	455 Square foot addition fo 1½ Sfr, Interior remodel and deck extension	Open	
	0.71	3,744	10579	6800 WESTWARD BEACH RD.	Malibu	New AOWTS	Open	
	1.53	8,089	10600	29140 CLIFFSIDE DR.	Malibu	Geo Pre App	Open	
	1.35	7,113	10644	6935 GRASSWOOD AVE	Malibu	NSFR	Open	
	1.23	6,479	10677	6950 DUME DR.	Malibu	PVD	Open	
	0.37	1,961	10695	30188 MORNING VIEW DR.	Malibu	314 sf extension of an existing deck (Lot has a deed restriction requiring CDP for all new development on property)	Open	
	1.59	8,415	10732	6638 WILDLIFE RD.	Malibu	Interior remodel	Open	
	1.40	7,403	10747	6431 KANAN DUME RD.	Malibu	SoCal Gas advanced meter	Open	
	0.86	4,532	10753	29958 HARVESTER RD.	Malibu	NSFR, detached garage, pool, remodel of guest house and barn	Open	
	1.01	5,322	10759	29201 LARKSPUR LN.	Malibu	Remodel, addition, pool/spa, landscaping	Open	
	1.28	6,780	10777	6701 PORTSHEAD RD.	Malibu	NSFR	Open	
	1.90	10,037	10808	28820 CLIFFSIDE DR.	Malibu	New Piles	Open	
	0.99	5,217	10820	30553 MORNING VIEW DR.	Malibu	Interior and exterior remodel to main house and pool house	Open	
	0.63	3,313	10832	5958 BUSCH DR.	Malibu	New trellis, gates, and enclosure of space below stairs to remedy code violation	Open	
	1.35	7,121	10858	7310 BIRDVIEW AVE	Malibu	New pool/spa and outdoor bbq	Open	
	1.08	5,712	10867	6614 DUME DR.	Malibu	Roof mounted solar	Open	

Table 2.7-1: Comprehensive List of Projects within Two Miles of Proposed Project Sites

Site ID	Distance (Miles)	Distance (Feet)	Project Name	Address	City	Project Description	Status	Schedule
	1.83	9,663	10884	31134 BROAD BEACH RD.	Malibu	Accessory Structure, remode kitchen, Remodel master bath, extend deck & replace finish	Open	
	1.12	5,927	10883	5427 HORIZON DR.	Malibu	Interior Remodel and 827 SF First Addition	Open	
	1.87	9,885	10903	6130 ZUMIREZ DR.	Malibu	Addition & Remodel	Open	
	1.51	7,968	10902	28834 SELFRIDGE DR.	Malibu	New Pool	Open	
	1.66	8,747	10906	6050 GALAHAD RD.	Malibu	PVD	Open	
	1.29	6,804	10908	29219 GREENWATER RD.	Malibu	Landscaping, hardscaping, new covered patio and irrigation system	Open	
	1.25	6,623	10909	6375 GAYTON PL	Malibu	Interior Remodel	Open	
	1.70	8,951	10954	6749 WILDLIFE RD.	Malibu	Expand driveway, new walkway and entry steps, new pre fab spa and sauna	Open	
	0.92	4,840	10959	30060 HARVESTER RD.	Malibu	Increase roof height, interior remodel, window and door replacement, re-side exterior, retrofit ex. Fireplace.	Open	
	0.86	4,556	10973	29921 HARVESTER RD.	Malibu	Over 500 sq. ft. addition and remodel	Open	
	0.93	4,931	10976	30536 MORNING VIEW DR.	Malibu	Demo existing 7,196 sq. ft. tennis court slab.	Open	
	1.38	7,263	10998	6324 CAVALLERI RD.	Malibu	New generator	Open	

3.0 Affected Environment, Environmental Impacts, and Mitigation Measures

This chapter contains sections for each of the environmental resource areas that are analyzed in this EIR. Each resource area contains the following general subsection headings:

- Environmental Setting
- Regulatory Setting
- Significance Criteria
- Impact Analysis
- Cumulative Impacts

The Environmental Setting provides relevant background information about the proposed Project's existing conditions. The Regulatory Setting discusses federal, state, and local laws, ordinances, and regulations pertaining to the proposed Project for a given environmental resource. Significance Criteria presents the thresholds for determining whether environmental effects of the Project are significant environmental impacts. The Impact Analysis presents the potential environmental consequences of the construction and operation of the proposed Project and the No Project Alternatives. Mitigation measures describe all reasonable and feasible means to reduce the impact to a level less than significant. Cumulative Impacts discusses potential cumulatively considerable project effects when project impacts are considered with other past, present and/or reasonably foreseeable future projects.

Consistent with CEQA Guidelines Section 1526.2(a), the baseline for the environmental setting used in this EIR is the physical conditions at the time the NOP was issued which was August 2014.

The Chapter 3.0 subsections are listed below:

- 3.1 Aesthetics
- 3.2 Air Quality
- 3.3 Biological Resources
- 3.4 Cultural Resources
- 3.5 Geology/Soils
- 3.6 Greenhouse Gas Emissions
- 3.7 Hazards and Hazardous Materials
- 3.8 Hydrology/Water Quality
- 3.9 Land Use/Planning
- 3.10 Noise
- 3.11 Recreation
- 3.12 Transportation/Traffic
- 3.13 Utilities/Service Systems



This chapter provides a summary of the Project impacts for these resources. Site summary forms containing site-specific analysis for each Project site are provided in Chapter 4.

3.1 Aesthetics

This section addresses existing aesthetic and visual resources in the project area. Visual and aesthetic resources within a landscape are composed of natural and cultural features that can be seen and that contribute to the public's appreciation and enjoyment of them. These resources include physical features that define the visual and aesthetic character of an area, including important natural features or scenic vistas, and can include man-made urban or community visual characteristics (e.g., architecture, skylines, or other elements) that create a visual definition for an area. Visual resources are important because of their uniqueness, and they often provide a sense of community for the inhabitants of an area.

3.1.1 Environmental Setting

Visual conditions can be expressed in terms of their visual character. Visual character is an impartial description of what the landscape consists of and is defined by the relationships between the existing visible natural and built landscape features. These relationships are considered in terms of dominance, scale, diversity, and continuity. Physical resources and features that define visual character include landform types, vegetation types, land uses, height, bulk, scale, and architectural detail of associated buildings and ancillary site uses, overhead utility structures and lighting, open space (e.g., parks, reserves, greenbelts, and undeveloped land), significant viewpoints and scenic views (e.g., views of waterbodies, mountains, historic structures, and downtown skylines), apparent "grain" or texture (e.g., density of development as well as size and distribution of structures and vacant properties or open spaces), and apparent upkeep and maintenance.

The general visual character of proposed Project sites can be categorized based on their locations in urban, rural, or remote areas. Urban areas are characterized by high concentrations of people and activity. Urban areas include the Los Angeles Basin and San Fernando and Santa Clarita valleys, along with developed portions of the Antelope Valley in the Mojave Desert and Santa Monica Mountains. Views typically include residential, commercial, and industrial building facades of varying architectural styles and urban streetscapes where paved streets with curbs and gutters are lined with utility poles, overhead distribution cables, and street lights.

Rural areas are generally located outside cities and towns and are characterized by minimal development and low population density. Within the Project area, such areas commonly occur where city boundaries transition to areas managed by federal land agencies. Views typically include small-scale development, such as single-story structures, views with few human-made obstructions, and few roads with minimal traffic. Signs of infrastructure, such as telephone poles and transmission lines, however, are visible. More views highly sensitive to the public exist in rural areas than urban areas.

Remote areas are more distant from cities and towns and are typically secluded. Remote areas in the study area include roads, trails, campgrounds, beaches, and similar areas in national forests, national recreation areas, and coastal zones. Views are typically natural and consist of few human-made obstructions and are often located within land set aside for protection of natural resources. Natural

features, such as ridgelines, forests, and waterbodies, are predominant. More views highly sensitive to the public exist in remote areas than urban and rural areas.

“Sensitive public views” are those that would be most affected by the Project. The “sensitivity” of a particular view is a function of viewer expectations, activity, awareness, values, and goals. For purposes of this Project, high sensitivity views are defined as:

- Views that are rare, unique, or in other ways special to the region or locale
- Views that are considered to be of local, regional, national, or global importance
- Views that are considered to be of high quality
- Views where the public is more aware and less tolerant of any adverse change
- Views where a small modification may be visually distracting and represent a substantial reduction in visual quality

The availability of certain activities tends to heighten viewer sensitivity of scenic resources (e.g., recreational pursuits), while others tend to focus attention on other aspects of the environment (e.g., commuting to work). Viewer sensitivity may also be heightened where visual resources are formally designated as being of special interest, such as state parks (Headley 2008). For purposes of this analysis, a visual resource with high visual sensitivity is considered a scenic vista⁴ or resource of particularly distinctive character or high quality, sensitive to relatively small changes. A visual resource with medium sensitivity is defined as a scenic vista or resource of moderately valued character or quality and reasonably tolerant of change. Sites with low sensitivity are considered those of low visual character and quality and can tolerate visual change. High visual sensitivity is considered to exist within the following areas:

- Sites located on public land administered by federal and state agencies whose primary mission includes natural resource protection and whose land management goals include protection of scenic resources (i.e., National Park Service [NPS], U.S. Forest Service [USFS], and the California Department of Parks and Recreation [DPR])
- Sites within or adjacent to the California coastal zone
- Sites adjacent to designated scenic highways and regional trails
- Sites within or adjacent to regional and municipal parks, open space, and recreation areas
- Sites within historic districts or at historic landmarks
- Sites at designated significant ridgelines

⁴ CEQA does not define the term “scenic vista.” Local plans can provide guidance as to what is valued as a scenic vista and were used to help identify scenic vistas. Determining whether or not a scenic vista exists can be very subjective if there is no guidance in planning documents. In *Mira Mar Mobile Community v. City of Oceanside*, the Court of Appeal, Fourth District determined that “under CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.”

No designated wild and scenic rivers were identified that would be affected by the Project.

The urban setting outside or immediately adjacent to the coastal zone does not typically contain sensitive public views; however, certain places such as parks within urban areas are considered to have high or medium sensitivity views.

Figure 3.1-1 shows the location of proposed Project sites within areas containing high or medium viewer sensitivity. Land within these areas constitutes the primary region of influence for aesthetic and visual resources based on their viewer sensitivity. These areas, and terminology used in tables, are described in the following sections. Table 3.1-1 lists the proposed Project sites that are located within high or medium viewer sensitivity areas. Some Project sites fall under multiple categories. Site-specific descriptions of the visual setting at each site and photographs of the sites are provided on the Site Summary Forms in Chapter 4.

While these areas are generally considered to have high or medium viewer sensitivity, site conditions may lower viewer sensitivity for some proposed Project sites.

Figure 3.1-1: Proposed Project Sites in Areas of High to Medium Viewer Sensitivity



Table 3.1-1. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/SAC ¹	USFS Land Use Zone									
BJM	Blackjack Peak				Santa Catalina Island LCP		Trans-Catalina Trail				High	X
BUR	Burnt Peak	High/SAC B	Back Country, Motor Vehicle Use Restricted								High	X
BUR1	Burnt Peak-1	High/SAC B	Back Country, Motor Vehicle Use Restricted								High	X
BUR2	Burnt Peak-2	High/SAC B	Back Country, Motor Vehicle Use Restricted								High	X
BUR3	Burnt Peak-3	High/SAC B	Back Country, Motor Vehicle Use Restricted								High	X
CPK	Castro Peak			X	Santa Monica Mountains LCP		Backbone Trail			X	High	X
DPK					Santa Catalina Island LCP		Trans-Catalina Trail				High	X
ENC1	Encinal 1 (Fire Camp 13)			X	Santa Monica Mountains LCP		Encinal Canyon Road				High	X
ENT	Entrada Tank			X			Old Topanga Road			X	High	X

Table 3.1-1. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/SAC ¹	USFS Land Use Zone									
FRP	Frost Peak (Upper Blue Ridge)	High/SAC A	Developed Area				Pacific Crest Trail				High	X
GMT	Grass Mountain	High/SAC B	Back Country								High	X
GRM				X	Brentwood Pacific Palisades Community Plan	Topanga State Park					High	X
H-17A								Hellman Park and Sycamore Canyon Open Space			Medium	
H-69B	H-69B			X	Santa Monica Mountains LCP		Saddle Peak Road			X	High	X
JOP	Josephine Peak	High/SAC B	Backcountry Motorized Use Restricted				State Route 2/ Angeles Crest Scenic Byway				High	X
JPK	Johnstone Peak-1	High/SAC B	Experimental Forest								High	X
JPK2	Johnstone Peak-2	High/SAC B	Experimental Forest								High	X

Table 3.1-1. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/SAC ¹	USFS Land Use Zone									
LACF 072	County FS 72			X	Santa Monica Mountains LCP		Decker Canyon Road				High	X
LACF CP08	Camp 8				Santa Monica Mountains LCP		Rambla Pacifico Street			X	High	X
LACF CP09	County CP 9	High/SAC B	Back Country								High	X
LACF CP11	County CP 11	High/SAC B	Developed Area								High	X
LEPS				X	City of Malibu LCP		Encinal Canyon Road				High	X
LPC	Loop Canyon	High/SAC B	Back Country								High	X
MML	Magic Mountain Link	High/SAC B	Back Country								High	X
MTL2	Mount Lukens-2	High/SAC B	Backcountry Motorized Use Restricted								High	X
PASP D01									X		High	
PMT	Pine Mountain	High/SAC B	Backcountry Motorized Use Restricted								High	X

Table 3.1-1. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/SAC ¹	USFS Land Use Zone									
PWT	Portshead Tank				City of Malibu LCP		Kanan-Dume Road				High	X
SGH								Hilltop and Sunset View parks			Medium	
SPN	Saddle Peak			X	Santa Monica Mountains LCP	Malibu Creek State Park	Backbone Trail			X	High	X
SUN	Sunset Ridge	High/SAC B	Experimental Forest								High	X
SUN2	Sunset Ridge 2	High/SAC B	Experimental Forest								High	X
TMT	Table Mountain	High/SAC A	Developed Area				State Route 2/ Angeles Crest Scenic Byway				High	X
TOP	Topanga Peak			X	Santa Monica Mountains LCP	Topanga State Park	Backbone Trail; Saddle Peak Road			X	High	X
TWR	Tower Peak				Santa Catalina Island LCP		Trans-Catalina Trail				High	X
VPK								Wildwood Canyon Park			Medium	X
WMP	Whitaker Middle Peak	High/SAC B	Developed Area								High	X



Table 3.1-1. Project Sites Located in Areas Generally Containing High or Medium Viewer Sensitivity

LMR Site	Name	Federal			State		Scenic Highway or Regional Trail	Regional or Municipal Park	Historic District	Significant Ridgeline	Visual Sensitivity*	Located Within a Scenic Vista
		Angeles National Forest and San Gabriel Mountains NM		Within SMMNRA Boundary	Coastal Zone	Park						
		SIO/SAC ¹	USFS Land Use Zone									
WS1	100 Wilshire				City of Santa Monica Uncertified LCP	Santa Monica State Beach	Pacific Coast Highway				High	X
WTR	Whitaker Ridge	High/SAC B	Developed Area								High	X
ZHQ				X	City of Malibu LCP		Pacific Coast Highway				High	X

¹ SIO Source: USFS 2005a; Class estimated from photographs.

*High visual sensitivity is defined as an important scenic vista or resource of particularly distinctive character or high quality, sensitive to relatively small changes. Medium visual sensitivity is defined as a scenic vista or resource of moderately valued character or quality and reasonably tolerant of change. Sites with low sensitivity are considered those of low visual character and quality and can tolerate visual change

Acronyms:

- LCP Local Coastal Program
- LMR Land Mobile Radio
- NRA National Recreation Area
- SAC Scenic Attractiveness Class
- SIO Scenic Integrity Objectives
- SMMNRA Santa Monica Mountains National Recreation Area
- USFS U.S. Forest Service

3.1.1.1 Federally Administered Lands

The visual resources setting for proposed Project sites located on lands administered by the USFS and NPS are described below.

U.S. Forest Service

USFS developed the Scenery Management System (SMS) as a methodology for classifying the aesthetic values of landscapes based on the scenic attractiveness of the landscape, the landscape's visibility, and the public's concern about changes in the landscape from a natural condition. The SMS recognizes the interdependence of aesthetics and ecological systems and promotes natural-appearing landscapes. Under the SMS, scenic integrity (which measures landscapes' inherent scenic attractiveness and the public's visual expectations for naturalness) is used to evaluate alterations in national forest landscapes (USFS 1995, 2005b).

To ensure that scenic integrity is maintained, the USFS has established six scenic integrity objectives (SIOs) derived from the landscape's attractiveness and the public's expectations or concerns. SIOs represent the minimum levels of scenic integrity to which landscapes are to be managed. Each SIO depicts a level of scenic integrity used to direct landscape management: very high (unaltered), high (appears unaltered), moderate (slightly altered), low (moderately altered), and very low (heavily altered). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels may occur during and immediately following project implementation (USFS 2005a, 2005b).

The SMS also defines "Scenic Attractiveness Classes" (SACs). SACs measure the scenic importance of a landscape based on human perceptions of intrinsic beauty and represent relative landscape value by combining distance zone (foreground, middleground, background, or "seldom seen"), concern level (high, middle, or low), and scenic attractiveness (distinctive, typical, or indistinctive) (USFS 1995).

U.S. Forest Service Assessment Methodology

For project sites located on land administered by the USFS, the agency's approach to visual resource assessment was used.

- 1) Inventory the existing visual resources on USFS land within the Study Area.
 - Define landscape character
 - Define scenic integrity objectives (SIOs): (very high (unaltered), high (appears unaltered), moderate (slightly altered), low (moderately altered), very low (heavily altered))
 - Define scenic attractiveness classes: SAC A – distinctive, SAC B – typical, SAC C – indistinct
- 2) Identify the magnitude of change to visual resource impacts (direct, indirect, cumulative impacts) based on the following indicators:
 - The extent to which existing landscape character would be sustained or changed

- The extent to which SIOs would be met
 - i. Determine if areas of existing scenic integrity would be substantially or irreversibly altered
 - ii. Determine if areas of high SACs would be altered
- 3) Determine whether the impact is significant or less than significant
 - Significant: Would result in a very high or high SIO changing to a moderate or lesser SIO and/or a reduction in SAC A to SAC B or C
 - Adverse but Not Significant: Would result in a moderate SIO changing to a low or very low SIO and/or reduction in SAC B to SAC C
 - Insignificant to No Impact: Would result in a low SIO changing to a very low SIO
- 4) Identify feasible mitigation measures to reduce or avoid significant impacts
- 5) Identify the significance of visual resource impacts with mitigation measures

Angeles National Forest

Several proposed Project sites are located in Angeles National Forest, which is divided into two separate geographic areas. The Santa Clara District is in the northwestern part of the proposed Project area. The Mojave River, Los Angeles River, and San Gabriel River ranger districts comprise one physical area in the east-central part of the Project area. The rugged wildland landscapes of southern California are increasingly valued for the visual contrast they provide in a rapidly urbanizing region. Driving for pleasure and viewing scenery have become some of the more popular national forest activities. Angeles National Forest (ANF) visitors expect a certain level of “naturalness” in the recreation and tourism settings they pursue. As the resident population continues to increase, conserving these remaining scenic landscapes in a natural-appearing condition becomes more important (USFS 2005c).

Within ANF, 24 percent of the landscape is considered “distinctive” (SAC A), 74 percent is considered “typical” (SAC B), and the remaining 2 percent is considered “indistinct” (USFS 2005c). The most attractive landscapes (classified as SAC-A) are located where the highest combination of landform, water form, rock form, and vegetation variety occurs. The more common landscapes (classified as SAC-B) consist of steep chaparral-covered mountains intermixed with foothill and valley areas consisting of oak woodland and grassland. The remaining landscapes (approximately 8 percent of the land base) are less distinctive, or SAC-C (USFS 2005c).

Land Use Zones

The ANF is divided into land use zones, which reflect the level or intensity of public use expected. The type of public use that occurs in an area can affect viewer sensitivity, as described above. The proposed Project sites within ANF will be located within the following ANF land use zones (USFS 2005c):

- Developed Area: Developed areas are adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human

use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, recreation and non-recreation special-use facilities, and national forest administrative facilities. The level of development varies between areas that are highly developed and areas where no development has occurred.

- **Back Country:** The Back Country zone includes areas that are generally undeveloped with few roads, including most of the ANF's remote recreation and administrative facilities. The level of human use and infrastructure is typically low to moderate. Although this zone allows a range of compatible uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development.
- **Back Country (Motorized Use Restricted):** The Back Country (Motorized Use Restricted) zone includes areas that are generally undeveloped and have few roads. Few facilities exist, but some may occur in remote locations. A network of low standard National Forest System roads (roads intended only for use by high-clearance vehicles, such as pickup trucks) provides access to this zone for a wide variety of non-motorized dispersed recreation opportunities. The level of human use and infrastructure is typically low. Although this zone allows a range of low intensity land uses, the management intent is to retain the natural character of the zone and limit the level and type of development.
- **Experimental Forest:** The Experimental Forest zone serves as a research and demonstration area and is generally closed to the public except by permit. This zone occurs only on the San Dimas Experimental Forest, which is managed by the Pacific Southwest Research Station.

Santa Monica Mountains National Recreation Area

The NPS jointly manages the Santa Monica Mountains National Recreation Area (SMMNRA) with the DPR and Santa Monica Mountains Conservancy (SMMC). Although NPS oversees the SMMNRA, the agency has direct responsibility for only about 15 percent of the land within the boundary; however, the NPS has “a less direct, but clear duty to support activities on non-NPS lands consistent with the purpose of the [SMM]NRA.” For purposes of identifying visually sensitive areas, proposed Project sites within the boundaries of the SMMNRA, whether administered by the NPS or not, are considered to be in an area of high visual sensitivity. The SMMNRA is to be managed to “preserve and enhance its scenic” and other values (NPS 2002). The Land Protection Plan (LPP) established for the SMMNRA established conservation criteria, including protection of regional scenic values, noting “scenic resources abound in the Santa Monica Mountains and the desire to preserve them was one of the reasons the national recreation area was established. The scenic values inherent in the rugged chaparral-covered mountains and oak-dotted hillsides are a critical component of the southern California experience....” (NPS 1998).

According to the 2014 *Los Angeles County General Plan Update EIR*, the Santa Monica Mountains play a major role in physically defining the topographically and aesthetically diverse communities. These landforms create dramatic backdrops against developed communities and provide extensive benefits to residents (County of Los Angeles 2014a). Similarly, the Santa Monica Mountains North Area Plan (County of Los Angeles 2000) notes that “natural terrain throughout the area is highly visible to residents,

motorists, and recreationists because of topographic features and generally rural conditions,” and “views of natural features are the focus of scenic preservation and enhancement.”

Proposed Project sites within the boundary of the SMMNRA are listed in Table 3.1-1; however, only sites LACFCP08 and PWT are on land administered by NPS.

3.1.1.2 Coastal Zone

Table 3.1-1 lists Project sites located within or adjacent to the designated coastal zone. Project sites within or adjacent to the coastal zone are located within the cities of Los Angeles, Malibu, and Santa Monica, and within Los Angeles County areas on Santa Catalina Island and the Santa Monica Mountains.

A substantial amount of the SMMNRA, which includes approximately 40 miles of shoreline, is within the coastal zone. All proposed Project sites within the Santa Monica Mountains LCP are also within the boundary of the SMMNRA.

3.1.1.3 Scenic Corridors

Areas adjacent to scenic highways and regional trails that contain proposed Project sites are described below.

Angeles Crest Scenic Byway

State Route 2 (SR-2) is a designated state scenic highway. It is also the Angeles Crest Scenic Byway, a 55-mile National Forest Scenic Byway that travels through the San Gabriel Mountains in the ANF and the San Gabriel Mountains National Monument. The goals of the National Forest Scenic Byways program include “showcase[ing] outstanding National Forest scenery” and “contribut[ing] to the nation’s overall scenic byways effort” (USFS n.d.). According to the 2014 *Los Angeles County General Plan Update EIR*, the San Gabriel Mountains play a major role in physically defining the topographically and aesthetically diverse communities. These landforms create dramatic backdrops against developed communities and provide extensive benefits to residents (County of Los Angeles 2014a).

Site TMT is approximately 0.4 mile northeast of the byway at its eastern end. At the western end of the byway, Site JOP is approximately 1.0 mile north of the byway. These sites are administered by USFS. Sensitive viewers include ANF recreationists, visitors, and drivers touring the scenic byway.

Pacific Coast Highway

Pacific Coast Highway (PCH or State Route 1) is a major north-south state highway that travels most of the Pacific coastline in California. PCH is a designated “All-American Road” and is among the nation’s most scenic. All-American Roads, along with National Scenic Byways, define 150 distinct and diverse roads that comprise “America’s Byways” as designated by the U.S. Secretary of Transportation. All of America’s Byways are considered “scenic” (FHWA n.d.) The section of PCH within the SMMNRA is eligible for the State Scenic Highway System designation (NPS 2002).

PCH extends between the Santa Monica Mountains and the Pacific Ocean and is situated immediately behind beaches and beachfront properties. It is the only coastal arterial along the SMMNRA's coastline, generally at an elevation between 5 and 50 feet above sea level. All routes that lead into the mountains to the north connect to PCH. PCH is the sole access route to numerous state beaches and several county beaches and parks. Beaches along PCH receive more than 30 million visitors per year (NPS 2002).

The roadside environment along PCH is diverse. The land side of the road is lined with commercial establishments in many areas, especially from Malibu to the east. Steep hillsides border the land side of PCH in many areas, making the land unsuitable for development in those places (NPS 2002).

Sites WS1 and ZHQ are located along PCH and are also located in the coastal zone. Sensitive viewers include beachgoers, visitors, commuters, and drivers touring the scenic highway.

City of Malibu Scenic Roads

Two sites are located along roads designated scenic by the City of Malibu within the city limits. These sites are located along Encinal Canyon and Kanan-Dume roads. Sensitive viewers include SMMNRA recreationists, visitors, and drivers touring the scenic roads. The city defines scenic roads as those "traversing or providing views of areas of outstanding scenic quality, containing striking views of natural vegetation, geology, and other unique natural features, including the ocean" (City of Malibu 2002).

Site LEPS is located along Encinal Canyon Road, although the site is not currently visible from the road. Site PWT is located along Kanan-Dume Road within the City of Malibu. The site is just below a sparsely vegetated, undeveloped ridgeline that obscures views of the site from this road when approached from the north.

Santa Monica Mountains North Plan Scenic Routes

The Santa Monica Mountains North Plan identifies certain roads as "routes with scenic qualities" (County of Los Angeles 2000). Project Site ENT is located adjacent to Old Topanga Canyon Road, which is a scenic route identified in the Plan.

Santa Monica Mountains Scenic Routes

The Santa Monica Mountains Local Coastal Program (LCP) Land Use Plan designates certain roads as scenic routes (County of Los Angeles 2014b). Project sites located adjacent to scenic routes as designated under this plan are:

- ENC1: Encinal Canyon Road
- H-69B: Saddle Peak Road
- LACF072: Decker Canyon Road
- LACFCP08: Rambla Pacifico Street
- TOP: Saddle Peak Road

Pacific Crest Trail

The Pacific Crest Trail (PCT), one of the country's first National Scenic Trails, spans 2,650 miles from Mexico to Canada through California, Oregon, and Washington and traverses the ANF generally from northwest to the southeast. Thousands of hikers and equestrians use this trail each year. Some travel only a few miles, while others complete every mile in a single season. The Pacific Crest Trail Association (PCTA) strives to protect the trail experience, which includes "wild scenery of the highest caliber and integrity," "refuge from industrialized civilization and its sights," and "therapeutic effects of elevated 'crest' views and naturally open landscapes." The desired condition described in the PCTA 2014-2017 Strategic Plan states, "Public lands within the Foreground Trail Corridor, including lands acquired and managed for the PCT, are managed to maximize a natural appearing landscape where human development does not dominate the viewer's experience..." (PCTA 2013). Sites GMT and FRP are in proximity to the trail.

Backbone Trail

The Backbone Trail is a Santa Monica Mountains ridgeline trail that follows ridges, traverses chaparral-covered hillsides, enters oak woodlands, and crosses creeks and valleys in the SMMNRA. Trail development has occurred piecemeal across a patchwork of public lands; therefore, the trail has different names in some sections, and not all sections are open to all users. When the trail is finished, it will extend more than 65 miles (NPS 2012). At least 43 miles have been completed. The NPS has identified a long-term goal of managing the Backbone Trail as a scenic corridor (NPS 2002). Sites CPK, SPN, and TOP are located in proximity to the trail.

Trans-Catalina Trail

Although it has no official scenic designation, the 37-mile Trans-Catalina trail, completed in 2009, traverses Catalina Island in its entirety and offers "spectacular views across the 43,000-acre Nature Preserve of the Catalina Island Conservancy" (Catalina Island Conservancy 2014). Sites BJM, DPK, and TWR are adjacent to this trail.

3.1.1.4 State and Regional Parks, Open Space, and Recreation Areas

Topanga State Park

Located in the Santa Monica Mountains, Topanga State Park provides 36 miles of trails through open grassland and live oaks and "spectacular" views of the Pacific Ocean. The park is considered the world's largest wildland within the boundaries of a major city. The park is bound on the south by Pacific Palisades and Brentwood, on the west by Topanga Canyon, and on the east by Rustic Canyon. Numerous geologic formations occur in the park, including earthquake faults, marine fossils, volcanic intrusions, and a wide variety of sedimentary formations (California DPR 2011).

Site GRM is located within this park on the Temescal Ridge Trail, as defined in the park's general plan. It is also south of the park's Temescal Lookout. Site TOP is immediately adjacent to the west end of the

park above Saddle Peak Road, which provides access to the park. The site is also adjacent to the park's Fossil Ridge Trail (California DPR 2011). Sensitive viewers include park recreationists and tourists.

Malibu Creek State Park

Malibu Creek State Park has been referred to as the “Yosemite of Los Angeles.” The 7,553-acre park is owned and operated by the California DPR and is bordered and buffered from developed land by other government-owned property. The park is located in the SMMNRA, described above. The Santa Monica Mountains connect this park to other parks and open space areas through a series of trail systems (California DPR 2003).

Site SPN is south of and overlooks Malibu Creek State Park. The Backbone Trail traverses this part of the park from east to west. Site SPN is intermittently visible to park visitors hiking this trail. No other recreational facilities exist in this area of the park.

Santa Monica State Beach

Santa Monica State Beach is 3 miles long, covering 245 acres of sand along Santa Monica Bay. The beach includes broad stretches of sand, bike and walking paths, and views of the Santa Monica Mountains. Santa Monica State Beach is managed by the City of Santa Monica in cooperation with California State Parks. Sensitive viewers include beachgoers, recreationists, and tourists. Site WS1 is located directly across from this beach, separated by Ocean Avenue and PCH.

Santa Monica Mountains Conservancy Lands

The SMMC was established to purchase, preserve, protect, restore, and enhance “treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public.” The SMMC preserves parkland in both wilderness and urban settings, including more than 114 public recreational facilities throughout southern California (SMMC 2014). Some of the affected SMMC lands are discussed in the SMMNRA, above. Additional lands described below may be affected by the project.

- **Hellman Park and Sycamore Canyon Open Space.** Hellman Park is located in Whittier’s Puente Hills. According to the 2014 *Los Angeles County General Plan Update EIR*, the Puente Hills play a major role in physically defining the topographically and aesthetically diverse communities of this area. These landforms create dramatic backdrops against developed communities and provide extensive benefits to residents (County of Los Angeles 2014a). Hellman Park offers trails into “some of the most beautiful habitat in the area.” A loop trail climbs the ridgeline overlooking Sycamore Canyon, providing “a beautiful view.” The trail follows a large collection of California brittlebush (*Encilia farinosa*), a sunflower family member with large yellow flowers in the spring. On a clear day Catalina Island and downtown Los Angeles are observable (SMMC 2014). Site H-17A is located on a ridgetop along Rattlesnake Ridge Trail in Hellman Park. The site would be visible from Rattlesnake Ridge Trail and Hellman Park Trail to the southeast, as well as from Sycamore Canyon Open Space to the north.

- **Wildwood Canyon Park.** Wildwood Canyon Park is located in Burbank on the south side of the Verdugo Mountains. The Verdugo Mountainway is an extensive trail system that extends from the Sun Valley area south to Glendale's Brand Park and to the northeast leading to Tujunga and La Crescenta. The trails and fire roads lead to "spectacular" views of the San Fernando Valley (SMMC 2014). Site VPK is located on the Verdugo Mountainway on a hilltop in an undeveloped area. The site would be viewed by park visitors using the trails.

Hilltop and Sunset View Parks.

Hilltop and Sunset View are two small parks located near Site SGH in Signal Hill. Hilltop Park is a circular-shaped park located to the west of the site. It includes covered picnic tables, a lawn, and rows of broadleaf and deciduous trees planted in a semi-circle around a circular concrete path. This park also provides broad, distant views to the south. Sunset View Park is south of the site and provides views of the distant horizon to the south. This elongated park parallels a road and consists of low grasses and shrubs, concrete benches, and a concrete path.

3.1.1.5 Historic Districts and Landmarks

City of Pasadena Historic District

Site PASPD01 is located on a vacant lot within the City of Pasadena's historic Civic Center District. This historic district is roughly bounded by Walnut and Green streets to the north and south, and Raymond and Euclid avenues to the west and east. The district is a "nationally significant example of civic art in the 'City Beautiful' style of the 1920s" (NPS 1980). The centerpieces are the Pasadena City Hall, which is fronted by a large, open plaza; Pasadena Public Library; and Pasadena Civic Auditorium. The district is dominated by its 1925 Beaux Arts-style City Hall and other "magnificent 1920s and 1930s buildings of the civic center" (Los Angeles Conservancy 2013).

The Civic Center area is distinct from surrounding neighborhoods both in architectural style and feeling and is less commercial and more park-like. It is a "carefully planned architectural entity" and a "unique collection of buildings and sites whose greatest value and impact arise from the fact that they relate to each other and the environment in a special way" (NPS 1980). The streets are wide and lined with trees, some paved with tile and brick set in decorative patterns. Small parks abound and are planted with trees and flowers (NPS 1980).

Several other buildings located within the historic district, including the Pasadena Public Library and First Baptist Church, incorporate similar design styles. The key buildings were designed in a homogenous style by nationally recognized architects. The site is directly south of the Pasadena Police Department, which was designed to be sensitive to the historic surroundings. The police department building has a 50-foot-high tower with exaggerated scrolled buttress supports. The beige stucco walls, arched windows, and terra cotta tile roof were meant to echo the 1920s-era themes of the civic center. The property is landscaped with a giant sycamore tree and drought-resistant plants (Los Angeles Conservancy 2013).

Newer structures show “an abandonment of architectural standards” that are out of keeping with the Civic Center as a whole (NPS 1980). One such structure is a five-level parking garage directly north of Site PASPD01 and west of the Police Department.

3.1.1.6 Significant Ridgelines

The County of Los Angeles designated significant ridgelines in two planning documents. One is the 2014 Los Angeles County General Plan; the other is the Los Angeles County Santa Monica Mountains North Area Plan. As defined by the Los Angeles County General Plan, a significant ridgeline possesses the following characteristics (County of Los Angeles 2014a):

- Topographic complexity
- Uniqueness of character and location
- Presence of cultural or historical landmarks
- Visual dominance on the skyline or viewshed, such as the height and elevation of a ridgeline
- Environmental significance to natural ecosystems, parks, and trail systems

Los Angeles County has also identified an implementation program to “prepare a Scenic Resources Ordinance that creates a scenic corridor, scenic viewshed, and significant ridgeline program and/or ordinance to protect remaining scenic resources” (County of Los Angeles 2014a). Sites H-69B, LACFCP08, SPN, and TOP are all located on ridgelines designated as “significant” by Los Angeles County in its 2014 General Plan.

The Santa Monica Mountains North Area Plan (2000) includes a directive to “preserve the area's hillside backdrop in its present state to the extent feasible, and control the design of development on ridgelines so that it will not interfere with significant views” (County of Los Angeles 2000). Site ENT is located on a significant ridgeline, according to the County of Los Angeles map for the area (County of Los Angeles 2004).

Site CPK is immediately adjacent to the NPS Castro Crest unit within the SMMNRA, which is a prominent ridgeline that forms part of the Backbone Trail corridor, with “stunning rock formations and views of the ocean and mountains” (NPS 2002).

Photographs of existing conditions at proposed Project sites are included in the site summary forms in Chapter 4.

3.1.2 Regulatory Setting

3.1.2.1 Federal Regulatory Setting

National Forest Management Act

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable

land management plans (LMPs). The ANF LMP includes guidance emphasizing the maintenance of scenic integrity objectives, restoring landscapes to reduce visual effects of nonconforming features, and maintaining the character of key places to preserve their intact nature and valued attributes (USFS 2005a).

National Park Service Land Protection Plan

The 1916 Organic Act established the National Park Service “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The NPS has not developed visual policies or formal guidance for managing visual resources on park lands; however, NPS units prepare General Management Plans (GMPs) to set long-term goals for individual park units that clearly define conditions to be achieved and maintained over time and the conditions necessary for visitors to enjoy the park’s significant resources (NPS 2006). Relevant information from the SMMNRA’s GMP is included under Scenic Corridors, above.

As mentioned under SMMNRA, above, the Land Protection Plan (LPP) established conservation criteria, including protection of regional scenic values. The plan notes “scenic resources abound in the Santa Monica Mountains and the desire to preserve them was one of the reasons the national recreation area was established” (NPS 1998).

3.1.2.2 State Regulatory Setting

California Scenic Highway Program

In 1963 the California Legislature created the Scenic Highway Program to protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. The state regulations and guidelines governing the Scenic Highway Program are found in the Streets and Highways Code, Section 260 et seq. A highway may be designated as “scenic” depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the travelers’ enjoyment of the view.

Coastal Act

California participates in the federal Coastal Zone Management Program established under the Coastal Zone Management Act of 1972. Regarding protection of visual resources, Section 30251 of the Coastal Act states:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of

Parks and Recreation and by local government shall be subordinate to the character of its setting.

The act encourages coastal states to develop and implement coastal zone management plans. The California Coastal Act (CCA) of 1976 (PRC 30000 et seq.) requires each city or county within the state's "coastal zone"⁵ to prepare an LCP for certification by the California Coastal Commission (CCC). LCPs contain the ground rules for future development and protection of coastal resources. LCPs specify appropriate location, type, and scale of new or changed uses of land and water. Each LCP includes a land use plan and measures to implement the plan (such as zoning ordinances) (CCC 2012). Once an LCP has been certified, a local government may issue coastal development permits. In the absence of a specific city or county LCP, coastal development permits are issued by the CCC. Coastal development permits issued by local governments are subject to appeal to the Coastal Commission (California Natural Resources Agency 1998).

3.1.2.3 Local Regulatory Setting

Local Coastal Programs

City of Malibu

Development within the City of Malibu is regulated by the certified LCP and Land Use Plan adopted by the city in 2002. Chapter 6 of Malibu's Land Use Plan addresses scenic and visual resources and incorporates Section 30251 of the Coastal Act, as described under State Regulatory Setting, above. Malibu's Land Use Plan states, "Places on and along public roads, trails, parklands, and beaches that offer scenic vistas are considered public viewing areas. Existing public roads where there are views of the ocean and other scenic areas are considered Scenic Roads." Scenic Roads in the proposed Project area, as defined by the City of Malibu, include PCH, Kanan-Dume Road, and Encinal Canyon Road (City of Malibu 2002).

Malibu's LCP limits the height of new structures to 18 feet or 28 feet on beachfront lots. Structures must be set below prominent and other intervening ridgelines that are visible from public areas; if not avoidable, structures are limited to 18 feet. Blufftop development must incorporate a setback from the edge of the bluff that avoids and minimizes visual impacts from the beach and ocean below (City of Malibu 2002). Additional restrictions developed by the city pertaining to PCH are described below.

Unincorporated Los Angeles County within Santa Monica Mountains NRA

Development of the coastal zone in the SMMNRA within unincorporated Los Angeles County is regulated by the Santa Monica Mountains Land Use Plan and LCP adopted by the county in 2014. The plan includes the following elements (County of Los Angeles 2014a):

⁵ Coastal zone is defined by the California Coastal Act as an area extending from the shoreline inland 1,000 yards from the mean high tide. In significant coastal estuarine, habitat, and recreational areas, it extends inland to the first major ridgeline paralleling the sea or five miles from the mean high tide line of the sea, whichever is less, and in developed urban areas the zone generally extends inland less than 1,000 yards.

- Limit the visual and safety impacts of wireless telecommunications facilities to preserve the character and aesthetics of surrounding areas, through careful design, screening, and mitigation requirements. Encourage undergrounding of accessory equipment, co-locating, and clustering wireless telecommunication facilities and structures, wherever possible, to help avert unnecessary proliferation of such facilities (Policy LU-52).
- Communication processing, storage and transmission facilities and lines shall be sited, designed, and operated to avoid or minimize impacts to...scenic resources.... If no feasible alternative can eliminate all impacts, then the alternative that would result in the fewest or least-significant impacts shall be selected (Policy LU-53).
- All facilities and related support structures shall be sited, designed, and operated to avoid when possible the visibility of the facility from public viewing areas, and to preserve the character of surrounding areas by protecting ridgelines by setting facilities below the ridge, and co-locating facilities, where feasible, to avoid proliferation of facilities (Policy LU-54).
- Limit structure heights to ensure protection of scenic resources and compatibility with surrounding settings (Policy LU-38).
- The height of structures shall be limited to minimize impacts to scenic resources (Policy CO-110).
- Site and design new development to minimize adverse impacts on scenic resources to the maximum extent feasible. If there is no feasible building site location on the proposed project site where development would not be visible, then the development shall be sited and designed to minimize impacts on scenic areas through measures that may include, but not be limited to, siting development in the least visible portion of the site, breaking up the mass of new structures, designing structures to blend into the natural hillside setting, restricting the building maximum size, reducing maximum height, clustering development, minimizing grading, incorporating landscape and building material screening elements, and where appropriate, berming (Policy CO-131).
- Avoidance of impacts to scenic resources through site selection and design alternatives is the preferred method over landscape or building material screening. Landscape or building material screening shall not substitute for project alternatives including re-siting or reducing the height or bulk of structures (Policy CO-132).
- Prohibit development on designated Significant Ridgelines and require that structures be located sufficiently below such Ridgelines so as to preserve unobstructed views of a natural skyline. All ridgelines other than Significant Ridgelines that are visible from a Scenic Route, public parkland, public trails, or a beach shall be protecting by siting new development below the ridgeline to avoid intrusions into the skyline where feasible. Where there is no feasible alternative building site...structures shall be limited to one story (18 feet maximum from existing or finished grade, whichever is lower) to minimize visual impacts and preserve the quality of the scenic area (Policy CO-136).

- Maintain dark skies in the Coastal Zone by reducing light pollution and requiring best available Dark Skies technology in all permitted lighting and compliance with Dark Skies principals and best practices to the maximum extent feasible (Policy CO-142).
- Require wireless telecommunication facilities to be designed and sited in such a manner that they minimize impacts to visual resources and blend into the landscape. Such facilities shall be co-located where feasible. This may include requiring one taller pole rather than allow multiple shorter poles. New wireless telecommunication facilities may be disguised as trees of a species that would likely be found in the surrounding area and that blend with the natural landscape when it is not feasible to co-locate on an existing pole (Policy CO-152).

City of Los Angeles

One proposed site – Site GRM – is located within the coastal zone of the City of Los Angeles, in the Pacific Palisades area. The City does not have an approved LCP for the Pacific Palisades area. Therefore, this area is regulated by applicable zoning or municipal codes or uncertified coastal plans. The 2001 Brentwood/Pacific Palisades Community Plan notes a “need to protect environmentally sensitive areas, scenic views and scenic corridors.” The plan includes a policy that states, “the scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.” The plan also includes a goal for “preservation of the scenic and visual quality of coastal areas.” This goal includes a policy to site and design permitted development “to protect views to the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in the visually degraded areas” (City of Los Angeles 2001).

City of Santa Monica

Development in the City of Santa Monica within the coastal zone is regulated by the city’s 1992 LCP; however, this LCP has not been certified by the CCC (City of Santa Monica 1992; CCC 2013). The site is in the city’s Ocean Avenue and Palisades Park Coastal Zone Sub-Area. Public views to, from, and along the ocean are protected by the LCP. Development must be visually compatible with the character of the surrounding area and must restore and enhance visual quality in visually degraded areas and protect public views to the coast. The city has established a height limit for development along Ocean Avenue and requires that views be protected by setbacks and view corridors. Height limits vary by density and range from 40 to 45 feet (City of Santa Monica 1992).

Santa Catalina Island

The Santa Catalina Island LCP was approved by the Los Angeles County Board of Supervisors on March 15, 1983, and was certified by the California Coastal Commission on November 17, 1983. Utilities

are allowed if the placement of such facilities is consistent with the policies of the LCP. Relevant plan policies and recommended actions include (County of Los Angeles 1983a, 1983b):

- The entire island as a whole is considered an important scenic resource.
- Views of ridgelines from water are a priority for viewshed protection.
- Limit new development in scope and carefully design it to be compatible with the unique character of the Island.
- Relate new development to the natural character of the Island by limiting building heights, specifying types of building materials and sensitively reviewing designs and landscaping materials.
- New development...shall be attractively designed to protect highly scenic natural or historical areas. Views of the shoreline, both from the land and water, should also be protected.
- Priority shall be assigned to protection of the land/water interface, ridgelines, distinctive geologic features, native trees and vegetation, natural streams and riparian habitats.
- Plant materials shall be used to integrate the manmade and natural environments, to screen or soften visual impacts of new developments and to provide diversity within developed areas. Native vegetation shall be favored in Easement areas while introduced vegetation from similar climates, such as palm trees and eucalyptus, shall be permitted in the more “urban” environments (e.g., Avalon Canyon, Two Harbors).
- Discourage siting of facilities such as communications facilities in high-visibility locations.

Los Angeles County General Plan Update Environmental Impact Report

The *Los Angeles County 2014 General Plan EIR* includes an ordinance for Hillside Management Areas (HMAs). HMAs were established to ensure that development preserves the physical character and scenic value of areas with a natural slope of greater than 25 percent. “Development” includes construction or expansion of any infrastructure; grading, such as cut, fill, or combination, including off-site grading; and removal of any vegetation. In order to accomplish this, provisions relating to HMAs encourage protecting scenic hillside views and conserving natural hillside character (County of Los Angeles 2014a). Project sites may occur in areas of steep terrain, but the sites themselves are relatively flat (natural slopes of less than 25 percent) and most have been previously developed.

The Los Angeles County Significant Ecological Areas (SEAs) Ordinance regulates areas representing a wide range of biotic communities through the use of environmentally sensitive development standards and designs (County of Los Angeles 2014c). According to the *Los Angeles County 2014 General Plan EIR*, SEA’s “complex ecological relationships are the subject of both aesthetic enjoyment as well as scientific study” (County of Los Angeles 2014a). The ordinance includes guidelines for landscaping, outdoor lighting, fencing, and brush clearance (County of Los Angeles 2014c). Because the focus of SEAs is on

biological communities, SEAs are further discussed in the Biological Resources section. Adhering to this ordinance through the required permitting process will also address visual impacts.

Pacific Coast Highway

As mentioned above, the section of PCH within the SMMNRA is also eligible for the State Scenic Highway System designation (NPS 2002). When a city or county nominates an eligible scenic highway for official designation, it must preserve the scenic quality of the corridor by adopting ordinances, zoning and/or planning policies in a Corridor Protection Program. Such programs protect the scenic corridor from encroachment of incompatible land uses; mitigate activities within the corridor that detract from its scenic quality by proper siting, landscaping, or screening; make development more compatible with the environment and in harmony with the surroundings; and preserve views of hillsides by minimizing development on steep slopes and along ridgelines (Caltrans 2014). The City of Malibu's LCP Land Use Plan (City of Malibu 2002) identifies protections for PCH, specifically stating:

- The Pacific Coast Highway corridor shall be protected as a scenic highway and significant viewshed.
- Any telecommunications facilities approved along Pacific Coast Highway shall place support facilities underground, where feasible.

3.1.3 Significance Criteria

The proposed Project would result in significant impact to aesthetics if any of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met:

- 1) Would the project have a substantial adverse effect on a scenic vista?
- 2) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 3) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?
- 4) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

3.1.4 Impact Analysis

The following methodology was used to identify existing visual resources and to determine the significance of visual impacts that may result from this project:

- 1) Identify the existing visual resources within 0.25 mile of proposed project sites. Visual resources can be described in terms of their visual character. Visual character is an impartial description of what the landscape consists of and is defined by the relationships between the existing visible natural and built landscape features. These relationships are considered in terms of dominance, scale, diversity, and continuity. Physical resources and features that define visual character include landform types; vegetation types; land uses; height, bulk, scale, and architectural detail of associated buildings and ancillary site uses; overhead utility structures and lighting; open

space (e.g., parks, reserves, greenbelts, and undeveloped land); significant viewpoints and scenic views (e.g., views of waterbodies, mountains, historic structures, and downtown skylines); apparent “grain” or texture (e.g., density of development as well as size and distribution of structures and vacant properties or open spaces); and apparent upkeep and maintenance.

- 2) Assess the sensitivity of existing visual resources. This is influenced by whether the visual resource is common or rare within the study area; whether it is considered to be of local, regional, national, or global importance; the quality of the resource; public awareness and tolerance of adverse change; and the ability of the resource to accommodate change. The sensitivity of each visual resource is classified as:
 - High: Important scenic vista or resource of particularly distinctive character or high quality, sensitive to relatively small changes
 - Medium: Scenic vista or resource of moderately valued character or quality, reasonably tolerant to change
 - Low: Scenic vista or resource of a relatively unimportant character or low quality which is largely tolerant to change
- 3) Determine level of change to visual resources as follows:
 - a. Would there be a change to a scenic vista (for purposes of this study, a scenic vista is viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public):
 - i. Does the location meet the definition of a scenic vista?
 1. Is the project located in the scenic view of a local/state/federal-designated scenic vista (e.g., significant ridgeline)?
 2. Is there compelling evidence to show that the view is designated/valued by the local community?
 3. Will the project eliminate or block views of valuable visual resources?
 - b. Would the change to a scenic vista
 - i. perceptibly change existing features of the physical environment so that they no longer appear to be characteristic of the scenic vista?
 - ii. introduce new features to the physical environment that are perceptibly uncharacteristic of the scenic vista?
 - iii. partially or totally block or removes views of the scenic vista?
 - c. Would the change to scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway:
 - i. cause the partial or full removal of a scenic resource?
 - ii. perceptibly change the existing features of a scenic resource so that its visual quality appears degraded?
 - iii. introduce new features to the physical environment that are perceptibly uncharacteristic of a scenic resource?

- a. Would the change to the existing visual character or quality of the site and its surroundings:
 - iv. perceptibly change existing features of the physical environment so that the visual character or quality of the site and its surroundings appear degraded?
 - v. introduce new features to the physical environment that appear incompatible with the site and its surroundings or would contrast noticeably and unfavorably with them?
 - d. Would the change affect day or nighttime views in the study area by introducing new sources of light or glare to the physical environment that:
 - i. perceptibly degrade views in the area?
 - ii. distract from views in the area?
- 4) Determine whether the impact is significant or less than significant. A significant impact would occur if the project would:
- a. have a substantial adverse effect on a scenic vista
 - b. substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
 - c. substantially degrade the existing visual character or quality of the site and its surroundings
 - d. create a new source of substantial light or glare which would adversely affect day or nighttime views in the area
- 5) Identify feasible mitigation measures to reduce or avoid significant impacts
- 6) Identify the significance of visual resource impacts after mitigation measures

3.1.4.1 Project Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

The following Project sites are located within an area that would be considered a scenic vista:

BJM	BUR	BUR1	BUR2	BUR3
CPK	DPK	ENC1	ENT	FRP
GMT	GRM	H-69B	JOP	JPK
JPK2	LACF072	LACFCP08	LACFCP09	LACFCP11
LEPS	LPC	MMC	MML	MTL2
OAT	PHN	PMT	PWT	SPN
SUN	SUN2	TMT	TOP	TPK
TWR	VPK	WMP	WS1	WTR
ZHQ				

Construction Impacts

Construction impacts would generally be related to construction of the new tower and equipment. Construction activities at individual sites would generally occur over an approximately six-week period and involve a variety of equipment, possibly involving 4-wheel drive trucks making daily trips to and from the site. Some sites will require the use of temporary construction staging areas where construction materials are stored and accessed during construction. The construction activities, construction staging areas, and dust generated by worker and materials transport would temporarily affect the viewshed; however, all construction activities and staging areas are considered temporary and would not result in substantial adverse impacts to any scenic vista. Construction impacts on scenic vistas would be less than significant.

Mitigation Measures

No mitigation measures required.

Operation Impacts

The following proposed Project sites located in areas identified as a scenic vista would include a new monopole or lattice tower collocated on a site with existing monopoles or lattice structures:

BJM	BUR	BUR1	BUR2	BUR3
CPK	DPK	FRP	GMT	GRM
JPK	JPK2	LACFCP09	LPC	MMC
MML	MTL2	OAT	PHN	PMT
SPN	SUN	SUN2	TMT	TOP
TPK	TWR	VPK	WMP	WTR
ZHQ				

When evaluating the significance of a visual change, views of all proposed sites within an approximate 0.25-mile radius were evaluated. For proposed sites with existing towers, if the existing tower is visible within a 0.25-mile radius, the proposed tower was assumed to also be visible and added to the existing visual intrusion, and not blocking or removing the view. This is because existing and proposed facilities are not large, wide structures, such as bridges or buildings that would block or remove views. Rather, they consist of slender towers or see-through lattice structures with various antenna configurations. Therefore, while they create a visual intrusion, they allow viewers to see beyond them and, as such, are not considered to block or remove views. If the existing tower could not be viewed within a 0.25-mile radius, and the proposed tower could be visible, the new tower was considered an added visual intrusion to the view, but not blocking or removing the view for reasons explained previously. Each site's visual setting was a key consideration in the assessment. This included consideration of elements such as linear man-made visual elements in urban areas, more natural vegetation and landforms with less human disturbance in more rural or remote areas, scenic vistas, or proximity to scenic highways. This analysis is reflected in the determinations of significance discussed below. Heights of existing and proposed structures are provided in Chapter 4.



Operational impacts for these sites would primarily result from the installation of monopoles of varying heights along with varying numbers of whip and microwave antennas. Other impacts would include one-story shelters, generators, and fuel tanks, if needed. Many of the sites already have monopoles and/or lattice structures, which create a visual intrusion onto the landscape. The placement of the new facilities generally would not perceptibly change the scenic vista due to the presence of the existing tower(s), which would attenuate the noticeability of the new structure(s). Locating the new tower(s) and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because the sites contain existing lattice towers or monopoles, the presence of a new lattice tower or monopole would not perceptibly change existing features and would not introduce new features that are perceptibly uncharacteristic of the existing scenic vista. In most cases, because the location is on a ridgetop, the new facilities would be added to the scenic vista but would not block or remove views of the scenic vista. Some of the new facilities (SUN, SUN2, and TMT) are located in areas at a lower elevation than the surrounding hillsides and are therefore obscure by surrounding topography. Views of other sites are obscured or intermittently blocked from view by road cuts and tall vegetation. These conditions minimize the sites' visual impact. For all the reasons discussed above, no substantial impacts to scenic vistas would occur; and impacts on scenic vistas would be less than significant for sites list in the above list.

The following Project sites that are located in an area identified as a scenic vista include a new monopole or lattice tower that is not collocated with other telecommunications structures:

ENC1	ENT	H-69B	JOP	LACF072
LACFCP08	LACFCP11	LEPS	PWT	

Operational impacts at Site ENC1 would include installation of a new 180-foot lattice tower, including microwave and whip antennas, an equipment shelter, and generator. Because the site is located in a low area surrounded by hills, including high earthen embankments and tall vegetation that would obscure views of the new tower, no substantial impacts to scenic vistas would occur at Site ENC1; and impacts on scenic vistas would be less than significant.

Site ENT operational impacts include installation of a new 70-foot monopole mounted with whip and microwave antennas, an equipment shelter, and generator. Although not collocated with other towers, it would be installed adjacent to existing water tanks which, given their mass, would help attenuate the presence of the new structure. Collocating the new tower(s) and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. The new facilities would be lower than hikers travelling east on the Calabaras Peak Motorway and of similar height to existing vegetation and therefore would not block or remove views of the scenic vista. For these reasons, no substantial impacts to scenic vistas would occur, and impacts on scenic vistas would be less than significant.

Operational impacts at Site H-69B would include installation of a new 180-foot undisguised lattice tower, including whip and microwave antennas, an equipment shelter, and generator. The facilities would be placed in a location with no existing structures. The new facilities would intrude upon views of the Pacific Ocean from vantage points to the north, including the significant ridgeline upon which the site would be located. Because no structure currently exists on the site, and because the site is located on a designated significant ridgeline and is adjacent to a scenic route, a substantial impact to scenic vistas would occur, resulting in a significant impact.

Site JOP includes installation of a new 180-foot lattice tower mounted with whip and microwave antennas, an equipment shelter, and generator. Existing solar panels at the site would be replaced with larger panels. The new facilities would be located in an area with no existing tall structures. Given the height of Josephine Peak in relation to the surrounding national forest, the new structure would intrude upon scenic vistas in the area. Because the new lattice tower would introduce a new vertical intrusion onto the landscape, a substantial impact to scenic vistas would occur, resulting in a significant impact.

Operational impacts at Site LACF072 include installation of a new 70-foot monopole, mounted with microwave and whip antennas, an equipment shelter, generator, and chain link fence surrounding the site. The new facilities would be constructed along the eastern boundary of the fire station property in an undeveloped moderately wooded area on a low hill. The height of the new monopole would be similar to the surrounding trees and would also be elevated above Decker Canyon Road on a hill that is obscured from view by cut banks. Although the monopole would include antennas and be wider than the telephone poles that line the road and the flagpole at the fire station, the monopole would be similar in height to those existing visual intrusions. As a result, given the stature of the new monopole and its location in the landscape, the site would not interfere with scenic vistas in the SMMNRA. For these reasons, no substantial impacts to scenic vistas would occur; and impacts on scenic vistas would be less than significant.

Site LACFCP08 operational impacts include installation of a new 70-foot monopole with microwave and whip antennas attached, an equipment shelter, and generator. The new facilities would be located within a site that has already been highly disturbed but is not easily visible from the scenic route or other readily accessible viewpoints due to highly varying topography, road curves, and the presence of trees and mature landscaping. The new facilities would not block or remove views, given the degree to which the site is currently obscured by topography and vegetation. In addition, the relatively low height and narrow girth of the monopole would not be sufficient to cause a substantial impact on scenic vistas; and impacts on scenic vistas would be less than significant.

Operational impacts at Site LACFCP11 include installation of a new 70-foot monopole with whip antennas attached, an equipment shelter, and generator. The hilltop with the site is lower than surrounding peaks and ridgelines. Both the new equipment shelter and monopole would be located in a previously cleared area beside the existing 20-foot tall water tank. The new facilities would be only intermittently visible from Soledad Canyon Road, where adjacent telephone poles present an existing human-made visual intrusion. The slender girth of the monopole and its location on a lower hilltop

beside an existing water tank would minimize impacts to scenic vistas, and the water tank would block views of the shelter from the road. Impacts on scenic vistas would be less than significant.

Site LEPS includes the installation of a new 70-foot tall monopole with microwave antennas attached, an equipment shelter, and generator. The new facilities would be located adjacent to a water tank, which is not visible from Encinal Canyon Road. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean; however, the greatly varying topography would obscure some views of the site. For views of the site that are not obscured by topography, the new facilities would create a new visual intrusion in the view but would not block or remove views of the scenic vista. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Therefore, no substantial impacts to scenic vistas would occur; and impacts on scenic vistas would be less than significant.

Operational impacts at Site PWT include installation of a new undisguised 28-foot monopole with whip antennas attached, an equipment shelter, and generator. The site is adjacent to an existing water tank, in a location occupied by a former water tank. The proposed monopole would be approximately the height of the existing water tank, and the perceptibility of the change to the scenic vista would be minimized. Additionally, the monopole would be at a lower elevation than the Ocean View Trail that curves around the site to the north, so the structure would be below the visual plane of ocean views from the trail. For these reasons, no substantial impacts to scenic vistas would occur; and impacts on scenic vistas would be less than significant.

The following Project site that is located in an area identified as a scenic vista includes roof mounted antennas:

WS1

Operational impacts at Site WS1 include placement of the antennas on the roof of an existing 320-foot-tall building. Due to the relatively short height of the antennas to be installed compared to the building, no substantial impacts to scenic vistas would occur; and impacts on scenic vistas would be less than significant.

Mitigation Measures

No mitigation measures could feasibly reduce the significant impacts of the proposed Project at Sites H-69B and JOP, as explained below.

Impacts after Mitigation

Significant impacts have been identified at sites H-69B and JOP. The only potential measure to mitigate impacts at these sites is painting the towers to blend with their visual settings, but this measure is infeasible because FAA guidelines (FAA Advisory Circular 70/7460-1L) require certain paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain

significant if they were painted to blend with the site’s visual setting. As such, no feasible mitigation measures exist to reduce the impacts to less than significant levels. Therefore, impacts are significant and unavoidable at sites H-69B and JOP.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No scenic resources were identified within any Project site boundary. The following Project sites are located adjacent to scenic highways as discussed in Section 3.1.1.3:

ENC1	ENT	H-69B	JOP	LACF072
LACFCP08	LEPS	PWT	TMT	WS1
ZHQ				

Construction Impacts

Each of the proposed Project sites listed above is located in a highly disturbed area, including existing communication sites or in urban locations. Site PWT is located on an asphalt surface, and Site WS1 is located on a high-rise building. For the remaining sites listed above, minimal vegetation exists; and no rock outcroppings, historic buildings, or other scenic resources are present. Although some vegetation such as grasses or shrubs may be disturbed during construction, no elements considered scenic resources would be damaged.

For sites along scenic roads that are located within the coastal zone, which includes sites ENC1, H-69B, LACF072, LACFCP08, LEPS, PWT, WS1, and ZHQ, project construction would not alter natural forms, as required within the coastal zone. Any impacts to historic resources would be precluded during the Section 106 process (see Section 3.4).

No scenic resources would be damaged at any proposed Project site. Therefore, impacts to scenic resources would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operational impacts would be as described under AES-1 (effects on a scenic vista). Operational impacts on scenic resources would be less than significant.

Mitigation Measures

No mitigation measures are required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impacts

The same construction activities described under AES-1 for scenic vistas and AES-2 for sites within a state scenic highway would apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. For building mount and existing lattice tower or monopole sites, existing antenna support structures would be used; and any additional equipment buildings or fencing that may be required would be consistent with the developed environment of the existing structures. Less than significant impacts would occur at the following sites, and no impacts would occur at the remaining sites.

AGH	AJT	BJM	BUR	BUR1
BUR2	BUR3	CPK	DPK	ENC1
ENT	FRP	FTP	GMT	GRM
H-17A	H-69B	JOP	JPK	JPK2
LACF072	LACFCP08	LACFCP09	LACFCP11	LEPS
LPC	MMC	MML	MTL2	OAT
PASPD01	PHN	PMT	PWT	SPN
SUN	SUN2	TMT	TOP	TPK
TWR	VPK	WAD	WMP	WTR
ZHQ				

Mitigation Measures

No mitigation measures are required.

Operation Impacts

As noted previously, visual impacts can result from the permanent installation, operation, and maintenance of proposed equipment for each site. Proposed equipment can include lattice towers and monopoles of varying heights (from up to 70 to 180 feet tall), microwave antennas, whip antennas, lightning rods, chain link fencing, generators and fuel tanks, and equipment shelters. For building mount and existing lattice tower or monopole sites, existing antenna support structures would be used. Any additional equipment buildings or fencing that may be required would be consistent with the developed environment of the existing structures. Methodology used to assess visual impacts is provided at the beginning of this section. As noted in the methodology, USFS scenic quality ratings and impact assessment methodologies were used for sites located on the agency's lands (see Table 3.1-1). The existing scenic quality ratings for those sites would not be downgraded based on the proposed Project.

The sites listed below would experience less than significant impacts, and sites H-69B, JOP, and PASPD01 would experience significant impacts. The remaining sites would experience no impacts.

AGH	AJT	BJM	BUR	BUR1
BUR2	BUR3	CPK	DPK	ENC1
ENT	FRP	FTP	GMT	GRM
H-17A	JPK	JPK2	LACF072	LACFCP08
LACFCP09	LACFCP11	LEPS	LPC	MMC
MML	MTL2	OAT	PHN	PMT
PWT	SPN	SUN	SUN2	TMT
TOP	TPK	TWR	VPK	WAD
WMP	WTR	ZHQ		

When evaluating the significance of a visual change, views of all proposed sites within an approximate 0.25-mile radius were evaluated. For proposed sites with existing towers, if the existing tower is visible within a 0.25-mile radius, the proposed tower was assumed to also be visible and added to the existing visual intrusion, and not blocking or removing the view. This is because existing and proposed facilities are not large, wide structures, such as bridges or buildings that block or remove views. Rather, they consist of slender towers or see-through lattice structures with various antenna configurations. Therefore, while they create a visual intrusion, they allow viewers to see beyond them and, as such, are not considered to block or remove views. If the existing tower could not be viewed within a 0.25-mile radius, and the proposed taller tower could be visible, the new tower was considered an added visual intrusion to the view, but not blocking or removing the view for reasons explained previously. Each site's visual setting was a key consideration in the assessment. This included consideration of elements such as linear man-made visual elements in urban areas, more natural vegetation and landforms with less human disturbance in more rural or remote areas, scenic vistas, or proximity to scenic highways. This analysis is reflected in the determinations of significance discussed below. Heights of existing and proposed structures are provided in Chapter 4.

Sites BUR, BUR1, BUR2, BUR3, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, SUN, SUN2, TMT, WMP, and WTR are located on USFS land. The USFS has designated the existing scenic attractiveness for sites FRP and TMT as A, which is considered distinctive, and for the remaining sites as B, which is considered typical. All of these sites, except for Site JOP are already impacted by the presence of existing towers and/or buildings. Although the proposed use would be incompatible with the larger surrounding landscape, it would be consistent with the existing sites. Therefore, the proposed Project use would result in no change to the sites' USFS scenic attractiveness ratings. Although there are no existing towers at Site JOP, this site's scenic attractiveness of B would not change because the site would still be considered to have scenery typical of many other locations in the ANF. This was considered in the evaluation of impacts for each site, as summarized below.

At sites AGH and MMC, the existing visual character and quality of the site is low (assessed as a scenic vista or resource of relatively unimportant character or low quality due to existing site conditions, and which is largely tolerant to change); and its surroundings are impacted by the presence of existing telecommunications facilities. Although the monopole (Site AGH) and tower (Site MMC) and associated

equipment would contrast with and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing use and equipment on site. Impacts would be less than significant.

At site AJT, the existing visual character and quality of the site are low and are already affected by an existing tower. The addition of new antennas to the existing lattice tower would not noticeably alter the site's visual character or quality. Impacts would be less than significant.

Sites BJM, CPK, DPK, GRM, and SPN are within an area of high visual character and quality; however, the existing visual character and quality of these sites and their surroundings have already been degraded by the presence of existing telecommunications equipment and tower(s). Although the new lattice tower and associated equipment at each site would contrast and be incompatible with the visual character of the surrounding landscape, the proposed facilities would be compatible with the telecommunications equipment that already exists at these sites. Impacts would be less than significant.

Sites BUR, BUR1, BUR2, and BUR3 are located in the ANF, which has designated the existing scenic attractiveness for the sites as B, which is considered typical. The existing visual character and quality of the sites and their surroundings are impacted by the presence of existing towers. Although the proposed new lattice towers and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing sites, resulting in no change to each site's scenic attractiveness rating. Impacts would be less than significant.

The existing landscape at Site ENC1 is characterized by the large fire station compound that includes several buildings, driveways, and paved parking areas; however, much of this development is hidden from view due to its location below the roadway that bypasses the compound and the steep topography that surrounds it. Drivers traveling through the area would mostly view the hilly topography and tall evergreen trees. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing compound within which the structures would be located. Impacts would be less than significant.

The existing visual character and quality of Site ENT and its surroundings are already impacted by the presence of two large water tanks. Although the monopole would introduce another man-made feature onto the landscape in the long term, it would not be significantly out of character with the surrounding trees, which are of similar height. The new monopole would also be in character with the telephone poles that currently line the nearby road, as well as the area's semi-residential setting. Impacts would be less than significant.

Sites FRP and TMT have a USFS scenic integrity objective of high; and the SAC rating is A, or distinctive; however, the sites are also identified as a Developed Area zone. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation and non-recreation special-use facilities. This zone is the lowest designation for naturalness. The sites are already impacted by the presence of existing facilities and towers of a similar nature. The surrounding forest also has been developed through the addition of ski area(s). The new

facilities would be compatible with the existing sites and with the surrounding landscape to a lesser extent. Impacts would be less than significant.

The existing visual sensitivity of Site FTP is low. The site is not within a scenic vista, and its visual quality has been degraded by the presence of the existing towers on the site. Although the new tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing use and equipment on the site. Impacts would be less than significant.

Sites GMT, LPC, MTL2, and PMT are located in the ANF, which has designated the scenic attractiveness for these sites as B, which is considered typical. The level of human use and infrastructure in a USFS backcountry zone is typically low to moderate. The backcountry zone allows a range of compatible uses; the management intent is to retain the natural character inherent in this zone and limit the level and type of development. The existing visual character and quality of the sites and their surroundings are impacted by the presence of existing tower(s). Although the proposed new lattice tower (Sites GMT, MTL2, and PMT) or monopole (Site LPC) and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing sites, resulting in no change to each site's scenic attractiveness rating. Impacts would be less than significant.

Site H-17A is within an area of medium visual character and quality. Construction impacts would result from installation of the new tower and equipment, which would be uncharacteristic of the visual character if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change or noticeably or unfavorably contrast with the existing visual character or quality due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, collocating the new tower and equipment with existing structures would concentrate the impacts so that a small area is altered, thereby minimizing impacts to visual character and quality. Impacts would be less than significant.

At site H-69B, the existing visual character and quality is low due to the size of the barren, disturbed area; however, the height of the new tower would contrast and be incompatible with the visual character of the surrounding landscape, which consists primarily of vegetated forests. Although some development, such as estate homes, exists, development is fairly sparse. The result would be a degradation of the visual character surrounding the site. Additionally, this site is along an adopted significant ridgeline within the Santa Monica Mountains LCP where new development is prohibited. Impacts would be significant.

Site JOP is located in the ANF, and the existing scenic attractiveness is designated B, which is considered typical. The proposed new tower would contrast and be incompatible with the visual character of the landscape, which is primarily forested. The result would be a degradation of the visual character surrounding the site. Because the mountaintop location does not currently contain existing towers, this represents a new vertical intrusion onto the landscape. The impacts would be significant.

Sites JPK and JPK2 are located in the ANF; and the existing scenic attractiveness is designated B, which is considered typical. The existing visual character and quality of the sites and their surroundings are impacted by the presence of existing communication sites and large lattice towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. Therefore, no change would occur to the designated scenic attractiveness rating. Impacts would be less than significant.

The existing visual character and quality of Site LACF072 and its surroundings are impacted by the presence of telephone poles and lines that parallel the road. The new monopole would be largely obscured by surrounding vegetation and topography, given the tower's 70-foot height. Therefore, the new facilities would be compatible with the visual character of the surrounding landscape. Impacts would be less than significant.

At Site LACFCP08, the existing visual character and quality is low given the extent of the previous disturbance and current use as a helicopter launch area. Although the monopole and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. In addition, this large disturbed area and the majority of the LACFCP08 facilities are not readily visible from area vantage points and would therefore not affect the area's visual character or quality, or the significance of the ridgeline. Impacts would be less than significant.

Site LACFCP09 is located in the ANF; and the existing scenic attractiveness for the site is designated B, which is considered typical. The new structures would be compatible with the existing site, which is a fire camp with associated facilities. The presence of helicopters also detracts from the existing visual character and quality. The low height of the new monopole would minimize impacts to the surrounding visual character, resulting in no change to the site's scenic attractiveness rating. Impacts would be less than significant.

Site LACFCP11 is located in the ANF; and the existing scenic attractiveness for the site is designated B, which is considered typical. The site is within an area identified as a Developed Area zone. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, and recreation and non-recreation special-uses facilities. This zone is the lowest designation for naturalness. The site is already impacted by the presence of a water tower and helicopters using the helipad. The new facilities would be compatible with the existing site and would not alter the area's visual character or quality, and no change would occur to the scenic attractiveness rating. Impacts would be less than significant.

The existing visual character and quality of sites LEPS and PWT and their surroundings have already been degraded by grading and the presence of a water tower at each site. The proposed new 70-foot monopole at Site LEPS and 28-foot monopoles at Site PWT, and associated equipment, would be compatible with the existing sites. Monopoles at these heights would blend into the surroundings. Impacts would be less than significant.

Site MML is located in the ANF; and the existing scenic attractiveness for the site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings have already been degraded by the presence of two lattice towers, shelters, and two water tanks. Although the new tower and associated equipment would contrast and be incompatible with the visual character of the larger area, they would be compatible with the existing site and immediate surrounding landscape, which has been modified for the Nike missile site. Impacts would be less than significant.

At Site OAT, the existing visual character and quality of the site and its surroundings have already been degraded by the presence of two lattice towers, as well as the numerous road cuts for the nearby oil rigs. The new tower and associated equipment would be compatible with the existing site and much of the surrounding landscape. Impacts would be less than significant.

Site PASPD01 is within the City of Pasadena's historic civic center area. The project includes a new 70-foot monopole with attached antennas, along with the associated equipment and equipment shelter. These elements would not be compatible with the civic center's distinctive Beaux Arts architectural style and feeling. The new structures would represent another "abandonment of architectural standards" that would not be consistent with the setting that led to formation of the historic district. Impacts would be significant.

The existing visual character and quality at sites PHN and TPK are low. The existing visual character and quality of the site and its surroundings have already been degraded by the presence of lattice towers (sites PHN and TPK), as well as the Nike missile site radio tower platforms (Site PHN only). The new tower and associated equipment would be compatible with the existing site and adjacent disturbed sites. Impacts would be less than significant.

Sites SUN and SUN2 are located in the ANF; and the existing scenic attractiveness for the site is designated B, which is considered typical. The existing visual character and quality of the sites and their surroundings has already been degraded by the presence of existing buildings and towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing sites. No change would occur to the site's scenic attractiveness rating. Impacts would be less than significant.

The existing visual character and quality at Site TOP is high; however, the existing visual character and quality of the site and its surroundings are impacted by the presence of the existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. No substantial change would occur to the visual character or quality of the significant ridgeline, SMMNRA, or Backbone Trail. Impacts would be less than significant.

At Site TWR, the existing visual character and quality of the site are high and are already affected by the existing tower. The new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, although they would be compatible with the existing site. Impacts would be less than significant.

At Site VPK, the existing visual character and quality of the site is medium; and its surroundings are impacted by the presence of existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and its immediate surroundings. Impacts would be less than significant.

Site WAD involves extending the height of the existing tower and adding antennas and other equipment. The new facilities would be compatible with the existing visual character and quality, which is low, and is surrounded primarily by residences. Despite extending the height of the existing tower, the tall trees that currently surround the site and the varying topography of the area would continue to obscure most of the site from view. Impacts would be less than significant.

Sites WMP and WTR are located in the ANF; and the existing scenic attractiveness for the sites is designated B, which is considered typical. The visual character and quality of the sites and their surroundings are impacted by the presence of existing towers. Although the new lattice towers and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the visual character of the existing sites and their immediate surroundings. No change would occur to the site's scenic attractiveness rating. Impacts would be less than significant.

At Site ZHQ, the existing visual character and quality of the site is high; however, the existing visual character and quality of the site and its surroundings are impacted by the presence of existing monopoles. The new monopole and associated equipment would be compatible with the existing site and with the surrounding, predominantly built environment. Impacts would be less than significant.

Mitigation Measures

Significant impacts have been identified at sites H-69B, JOP, and PASPD01. A measure to reduce the significant visual impacts at Site PASPD01 has been identified under Cultural Resources, which is summarized below. No mitigation measures could feasibly reduce the significant impacts of the Project at sites H-69B or JOP, as explained below.

Impacts after Mitigation

Under Cultural Resources, implementation of CUL MM 5 (camouflage) would reduce significant visual impacts to less than significant with mitigation incorporated. This mitigation measure would also reduce significant visual and aesthetic impacts at this site to less than significant with mitigation incorporated. Refer to Section 3.4, Cultural Resources for more information. The only potential mitigation measure available for sites H-69B and JOP is to paint the new facilities to blend with the site's visual setting. This measure is infeasible. FAA guidelines (FAA Advisory Circular 70/7460-1L) require specific paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain significant if they were painted to blend with the site's visual setting. As such, no feasible mitigation measures were identified to reduce the impacts to less than significant levels. Therefore,

impacts are significant and unavoidable at sites H-69B and JOP. No mitigation measures are required at other proposed Project sites because impacts are less than significant.

AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impacts

The same construction activities described in AES-1 for scenic vistas would apply to AES-4. With regard to light or glare impacts, temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. Construction would not result in the creation of a new source of substantial light or glare, and impacts at all proposed Project sites would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

This section provides an assessment of light or glare impacts from operation of proposed Project sites, based on general site locations (urban areas and rural or remote areas).

Urban Areas

The proposed Project sites listed below would be located in urban areas and would include construction of new monopoles or lattice towers. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. The sites listed below are in urban areas where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower (monopole) lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact for all of the proposed sites with new monopoles or lattice towers in urban areas, including the following sites:

AGH	ASD	PASPD01	PWT
SDW	SGH	ZHQ	

The proposed Project sites listed below would also be located in urban areas and would include installation of up to 20 to 25 whip antennas and up to 7 microwave antennas on roof tops of existing buildings. The new facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source



of day or nighttime light or glare that would adversely affect nighttime views of the area, resulting in a less than significant impact for all of the proposed sites that involve installing antennas on building rooftops in urban areas, including the following sites:

LARICSHQ PDC SIM WS1

Site WAD would also be located in an urban area but would include installation of up to 20 whip antennas and up to 5 microwave antennas on an existing 120-foot monopole to be extended up to 140 feet, with additional up to 15 foot lightning rod. The new facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area, and impacts at Site WAD would be less than significant.

Rural or Remote Areas

The sites listed below would be located in rural or remote areas and would also include construction of new monopoles or lattice towers with the same safety tower lighting described above. Sites located in rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), proposed Project facilities would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area, resulting in a less than significant impact for all of the proposed sites with new monopoles or lattice towers in rural or remote areas, including the following sites:

BJM	BUR	BUR1	BUR2	BUR3
CPK	DPK	ENC1	ENT	FRP
FTP	GMT	GRM	H-17A	H-69B
JOP	JPK	JPK2	LACF072	LACFCP08
LACFCP09	LACFCP11	LEPS	LPC	MMC
MML	MTL2	OAT	PHN	PMT
RIH	SPN	SUN	SUN2	TMT
TOP	TPK	TWR	VPK	WMP
WTR				

Site AJT would also be located in a rural area but would include installation of up to 40 whip antennas and up to 9 microwave antennas on existing lattice tower. The new facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This

would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area, and impacts at Site AJT would be less than significant.

Mitigation Measures

No mitigation measures are required.

3.1.4.2 No Project Analysis

Under the No Project Alternative, no new communications facilities would be constructed at the proposed Project locations. As a result, the visual character and quality of the proposed Project sites would not be affected by implementation of the No Project alternative.

3.1.5 Cumulative Impacts

3.1.5.1 Geographic Extent

As described in the aesthetic resources impact methodology in Section 3.1.4, the impact analysis for aesthetics considers the area within 0.25 mile of each proposed Project site. Table 2.7-1 identifies other projects within 0.25 mile of the following proposed Project sites: ENT, LEPS, MML, PASPD01, PDC, PHN, PWT, RIH, SGH, SUN, SUN 2, WS1, and ZHQ. No other projects were identified within 0.25 mile of other proposed Project sites.

3.1.5.2 Existing Cumulative Conditions

Each of these proposed Project sites is in a location that contains other structures such as other telecommunications tower and facilities, water tanks, and buildings. Sites PASPD01, PDC, SGH, and WS1 are in urban settings where the visual setting consists primarily of man-made landscapes. Other projects identified within 0.25 mile of the proposed Project sites include other telecommunications sites including LTE project facilities (see Section 1.1.3.2) and LMR facilities that have been statutorily exempted as described in Section 1.3.2, as well as other types of projects such as residential developments and mixed-use, commercial, hotel, and cinema developments. Other projects that consist of new telecommunication or other types of similar structures such as transmission lines that introduce vertical elements into the visual setting have been identified in the vicinity of sites MML, PASPD01, PDC, PHN, RIH, SUN, SUN2, and WS1. At sites ENT, PWT, SGH, and ZHQ, adjacent projects consist only of single-family residences, modification to residences, or residential property-related development such as landscaping and a tennis court and equestrian facility modifications.

3.1.5.3 Cumulative Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Of the proposed Project sites listed in Section 3.1.5.1, the following are in areas identified as a scenic vista: ENT, LEPS, MML, PHN, PWT, SUN, SUN 2, WS1, and ZHQ. The remaining sites are not in a scenic vista; therefore, no cumulative impacts to scenic vistas would occur at other proposed Project sites.

At sites ENT and ZHQ, an up to 70-foot monopole and an up to 28-foot monopole respectively are proposed. At both of these sites the only adjacent projects are residential or residential-related. No cumulative impact to scenic vistas is expected because these other projects would be consistent with the existing residential visual settings at these sites. No cumulative impacts to aesthetics would occur at these sites.

At Site LEPS an up to 70-foot monopole is proposed at an existing water tank. Adjacent projects are residential or residential-related and an upgrade to another existing water tank (i.e., it is a different water tank from the one at Site LEPS). No cumulative impact to scenic vistas is expected because these other projects would be consistent with the existing visual setting. No cumulative impacts to aesthetics would occur.

Site MML is an alternate to the statutorily exempt LMR Site MAM. Both are a proposed up to 180-foot lattice tower; however, because only one of these two LA-RICS LMR sites would be developed, no cumulative impact to scenic vistas would occur.

At Site PHN a new up to 180-foot lattice tower is proposed. Site PHN currently contains two lattice towers. The other project identified at this site is the collocation of LTE antennas on one of these existing towers. Collocation of LTE antenna on an existing tower would not affect scenic vistas and both the LTE project and the proposed Project would be consistent with the existing visual setting of the site. No cumulative impacts to scenic vistas would occur.

At Site PWT an up to 28-foot monopole is proposed at an existing water tank. Identified projects in the vicinity of this site are associated with existing residential properties and an equestrian facility. No cumulative impact to scenic vistas is expected because these other projects would be consistent with the existing visual setting. No cumulative impacts to aesthetics would occur.

At sites SUN and SUN2, a new up to 180-foot lattice tower is proposed. Only one LMR tower would be built between these two sites. Other telecommunications tower projects are identified near these sites, including an up to 220-foot tower. Sites SUN and SUN2 currently contain multiple telecommunications towers. The proposed Project and the other projects would be consistent with the existing visual setting of the sites, and no cumulative impacts to scenic vistas would occur.

Site WS1 is a proposed roof mount on an existing 320-foot building located in an urban setting within the coastal zone. Several projects including mixed-use developments and other telecommunications towers are proposed nearby. Development of these types of project in an already developed urban setting would not be expected to result in cumulative impacts to a scenic vista. In addition, the installation of LMR antennas on the roof of this tall building would not be expected to contribute to any cumulative impact to a scenic vista.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No scenic resources were identified within any Project site boundary. Of the proposed Project sites listed in Section 3.1.5.1, the following are in areas identified as scenic highways: ENT, LEPS, PWT, WS1, and ZHQ. Proposed Project sites MML, PASPD01, PDC, PHN, RIH, SGH, SUN, and SUN2 are not in a scenic highway and would not substantially damage scenic resources; therefore, no cumulative impacts to scenic resources in scenic highways would occur at other proposed Project sites.

Cumulative impacts to scenic resources within scenic highways would be similar to that provided for scenic vistas for each of these sites under cumulative impact AES-1. No scenic resources would be substantially damaged by the proposed Project at any site; therefore, no cumulative impacts would occur.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

No impacts to visual character or quality from the proposed Project were identified at sites PDC, RIH, SGH, and WS1; therefore, no cumulative impacts from the proposed Project would occur. Cumulative impacts to visual character or quality at sites ENT, LEPS, MML, PHN, PWT, SUN, SUN2, and ZHQ, would be similar to those described under cumulative impact AES-1 for scenic vistas. No cumulative impacts to visual character or quality would occur.

One site, PASPD01, was not analyzed as a scenic vista. An up to 70-foot monopole is proposed at this site. Site PASPD01 is in a developed urban area that is a historic district. This site is also an LTE site where antennas were mounted on an existing parking structure which did not substantially degrade the historic visual setting. Other projects would be consistent with the setting of the historic district. Without mitigation, the proposed Project monopole would be out of character with the historic district; however with mitigation to camouflage the monopole, the impacts of this site would not be cumulatively considerable.

AES-4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

All of the projects identified within 0.25 mile of the proposed Project sites would likely entail some lighting. Lighting associated with telecommunications facilities and residential and mixed-use, commercial, and hotel development would be expected to be consistent with existing lighting conditions associated with similar structures currently present in areas with those land uses. No cumulative impact from light or glare would occur.

As described under impact AES-1, at Site MML, only this site or its alternate, the statutorily exempt LMR Site MAM, would be developed. No cumulative impact from light or glare would occur.

3.2 Air Quality

This air quality assessment is based on the methodology and results provided in Appendix B. This section describes the existing regulatory framework for air quality management along with existing air quality conditions in the Project vicinity. Air quality emissions impacts associated with construction and operation of the Project are summarized below, along with a determination of their significance in relation to applicable air quality standards. A detailed discussion of each site is provided in Chapter 4.

3.2.1 Environmental Setting

3.2.1.1 Climate and Meteorology

The Project is located within portions of the Mojave Desert Air Basin (MDAB) and the South Coast Air Basin (SCAB) (Figure 3.2-1). The SCAB is almost completely enclosed by mountains to the north and east, resulting in a fairly regular daily reversal of wind direction – offshore at night and onshore during the day. With the concentrated population and industry, pollution products tend to accumulate and remain within this circulation pattern. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet).

Summer is a dry period over most of the state due to the semi-permanent Pacific high pressure that deflects most storms far to the north. In winter, the Pacific high pressure weakens and shifts southward. Upwelling ceases, and winter storms become frequent.

According to the Western Regional Climate Center (WRCC), the most representative meteorological monitoring station within the SCAB is in Los Angeles, California. The station (WRCC Station #045115, Los Angeles Civic Center) is considered representative because of its central location within the SCAB, located on the University of Southern California campus, and because of the time span for weather data collection (1877 to 2015). Temperature and precipitation data recorded at this station indicate that average maximum temperatures during the winter and summer months range from 66.4 to 83.1 degrees Fahrenheit, respectively. Annual average precipitation recorded at this station is approximately 15 inches, with over 95 percent of the seasonal rainfall between October and April. Complex terrain and weather patterns within the SCAB make it a natural sink for the accumulation of emissions and sustained high pollution levels. The climate is relatively mild, with cooler temperatures and a pattern of onshore airflow along the coastal area, which improves air quality. In the inland portion of the air basin, however, a combination of abundant sunshine, warm temperatures, and poor vertical air mixing is conducive to the formation of ozone, commonly referred to as “smog.” The problem is worsened by the surrounding mountains that act together with the weather to trap air pollutants.

According to the WRCC, the most representative monitoring station within the MDAB is in Lancaster, California. The station (WRCC Station #0447749, Lancaster William J Fox Airfield) is considered representative because of its central location within the western reaches of the MDAB and because of the time span for weather data collection (1974 to 2015). Temperature and precipitation data recorded at this station indicate that average maximum temperatures during the winter and summer months

range from 57.9 to 96.5 degrees Fahrenheit, respectively. Annual average precipitation recorded at this station is approximately 7 inches, with over 90 percent of the seasonal rainfall between October and April. Key topographical features that define the MDAB are the San Gabriel Mountains to the south, the southern end of the Sierra Nevada Mountains to the north, and the Tehachapi Mountains to the west near the Project area. Temperature has a major effect on vertical air mixing, impacting local pollutant concentrations. The climate of the MDAB is characterized by relatively hot summers, mild winters, large diurnal ranges in temperature, irregular rainfall, low relative humidity, and abundant sunshine.

3.2.1.2 Attainment Status

The U.S. Environmental Protection Agency (USEPA) is responsible for establishing National Ambient Air Quality Standards (NAAQS) for six criteria pollutants including carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (coarse particles less than or equal to 10 microns in diameter (PM₁₀) and fine particles less than or equal to 2.5 microns in diameter (PM_{2.5})), and lead (Pb). Areas can be classified with the NAAQS as nonattainment, maintenance, attainment, or unclassified. The California Environmental Protection Agency Air Resources Board (CARB) is responsible for ensuring that California ambient air quality standards (CAAQS) are met for these pollutants. Similar to the NAAQS, areas are classified as nonattainment, maintenance, attainment, or unclassified with respect to the CAAQS.

Geographic areas that exceed National and/or State Ambient Air Quality Standards (NAAQS and CAAQS) for a criteria pollutant are considered “nonattainment” areas for that pollutant. Conversely, areas that are below a criteria pollutant standard are considered “attainment.” Maintenance areas are defined as previously exceeding the NAAQS or CAAQS (nonattainment) for a criteria pollutant but are presently attaining that standard. Maintenance areas are required to develop a maintenance plan outlining steps for continued attainment over the maintenance period. Table 3.2-1 summarizes the attainment status within the Project area.

Table 3.2-1: Attainment Status within the Project Area

Criteria Pollutant	County	Federal Status	State Status
Mojave Desert Air Basin			
Carbon monoxide (CO)	Los Angeles and San Bernardino	Attainment	Attainment
Lead	Los Angeles and San Bernardino	Attainment	Attainment
Nitrogen dioxide (NO ₂)	Los Angeles and San Bernardino	Attainment	Attainment
Ozone (O ₃)	Los Angeles and San Bernardino	Non-attainment	Non-attainment
Fine Particulate Matter (PM _{2.5})	Los Angeles and San Bernardino	Attainment	Unclassified ¹
Coarse Particulate Matter (PM ₁₀)	Los Angeles and San Bernardino	Unclassified ²	Non-attainment
Sulfur dioxide (SO ₂)	Los Angeles and San Bernardino	Unclassified	Attainment
Particulate sulfate	Los Angeles and San Bernardino	n/a	Attainment
Hydrogen sulfide	Los Angeles and San Bernardino	n/a	Unclassified

Table 3.2-1: Attainment Status within the Project Area

Criteria Pollutant	County	Federal Status	State Status
Visibility-reducing particles	Los Angeles and San Bernardino	n/a	Unclassified
South Coast Air Basin			
Carbon monoxide (CO)	Los Angeles, Orange, and San Bernardino	Maintenance	Attainment
Lead	Los Angeles, Orange, and San Bernardino	Non-attainment ³	Attainment
Nitrogen dioxide (NO ₂)	Los Angeles, Orange, and San Bernardino	Maintenance	Attainment
Ozone (O ₃)	Los Angeles, Orange, and San Bernardino	Non-attainment	Non-attainment
PM _{2.5}	Los Angeles, Orange, and San Bernardino	Non-attainment	Non-attainment
PM ₁₀	Los Angeles, Orange, and San Bernardino	Attainment	Non-attainment
Sulfur dioxide (SO ₂)	Los Angeles, Orange, and San Bernardino	Attainment	Attainment
Particulate sulfate	Los Angeles, Orange, and San Bernardino	n/a	Attainment
Hydrogen sulfide	Los Angeles, Orange, and San Bernardino	n/a	Unclassified
Visibility-reducing particles	Los Angeles, Orange, and San Bernardino	n/a	Unclassified
1. Portions of San Bernardino County within the MDAB located outside the Project area are designated nonattainment for the PM _{2.5} CAAQS. 2. Portions of San Bernardino County within the MDAB located outside the Project area are designated nonattainment for PM ₁₀ NAAQS. 3. Portions of San Bernardino and Riverside counties within the SCAB are designated attainment for the Lead NAAQS.			

Figure 3.2-1: Basins, Management Districts, Class I Areas, Showing Proposed Project Sites



Source: EPA 2014b

3.2.1.3 Existing Air Quality Monitoring Data

USEPA, CARB, and local air districts select and maintain a statewide network of monitoring stations that routinely measure pollutant concentrations in the ambient air. These stations provide data to assess compliance with the NAAQS and CAAQS and to evaluate the effectiveness of pollution control strategies. Forty six monitoring stations are located within the MDAB and SCAB. Table 3.2-2 shows summary data of maximum ambient levels of criteria pollutants for which the SCAB is nonattainment/maintenance (e.g., PM_{2.5}, O₃, CO, and NO₂) at selected locations as reported in the *Final 2012 Air Quality Management Plan* (SCAQMD 2013). The locations chosen are those in the monitoring network that are most centrally located within Los Angeles and San Bernardino counties, respectively for which monitoring data was reported.

Table 3.2-2: South Coast Air Basin Monitored Criteria Pollutant Concentrations by County

Criteria Pollutant	County	Monitored Values		% of Standard	Area
		Standard	Maxim		
Fine Particulates (PM _{2.5})	Los Angeles ¹	24-HR Average (35 µg/m ³) ¹	49.5 ²	139 ³	East San Gabriel Valley
		Annual Average (15 µg/m ³) ¹	13.3	89	Central Los Angeles
	San Bernardino	24-HR Average (35 µg/m ³) ¹	65.0	183 ³	Central San Bernardino Valley
		Annual Average (15 µg/m ³) ¹	13.3	89	Southwest San Bernardino Valley
Ozone (O ₃)	Los Angeles	1-HR Average (0.12ppm)	0.144	115	Santa Clarita Valley
		8-HR Average (0.075 ppm)	0.122	162	Central Bernardino Mountains
	San Bernardino	1-HR Average (0.12 ppm)	0.160	128	Santa Clarita Valley
		8-HR Average (0.075 ppm)	0.136	180	Central Bernardino Mountains
Carbon Monoxide (CO)	Los Angeles	1-HR Average (35 ppm)	6.0	17	South Central L.A. County
		8-HR Average (9 ppm)	4.7	49	Central San Bernardino Valley
	San Bernardino	1-HR Average (35 ppm)	1.8	5	South Central L.A. County
		8-HR Average (9 ppm)	1.7	18	Central San Bernardino Valley
Nitrogen Dioxide (NO ₂)	Los Angeles	1-HR Average (100 ppb)	109.6	109	Central L.A. County
		Annual Average (53 ppb)	24.6	46	
	San Bernardino	1-HR Average (100 ppb)	76.4	76	Central San Bernardino Valley
Nitrogen Dioxide (NO ₂)	San Bernardino	Annual Average (53 ppb)	21.1	39	Central San Bernardino Valley

Table 3.2-2: South Coast Air Basin Monitored Criteria Pollutant Concentrations by County

Criteria Pollutant	County	Monitored Values		% of Standard	Area
		Standard	Maxim		
Lead (Pb)	Los Angeles	3-Month Rolling Average (0.15 µg/m ³)	0.46 ⁵	297	Central Los Angeles
	San Bernardino		0.01		6

Source: South Coast Air Quality Management District (SCAQMD) *Final 2012 Air Quality Management Plan* (SCAQMD 2013).
 Notes: micrograms per cubic meter (µg/m³); parts per million (ppm); parts per billion (ppb)

- Based on federal reference method (FRM) data.
- One higher concentration that was recorded due to “Independence Day” firework activities has been flagged for exclusion from NAAQS comparison in accordance with the U.S. EPA Exceptional Events Rule; with this data included, the 2009 – 2011 design value for East San Gabriel Valley would also exceed the federal standard.
- Although maximum 24-hour concentrations exceed the standard, the 98th percentile form of the 2009 – 2011 design value only exceeded the standard at one station in Metropolitan Riverside County (Mira Loma).
- Based on FRM and federal equivalent method (FEM) data.
- This high lead concentration was measured at a site immediately downwind of a lead source.

An exceedance of the concentration standard does not necessarily indicate a violation of the NAAQS because a violation depends on the form of the standard. For instance, the form of the 24-hour average standard for PM_{2.5} is established by the average of 98th percentile values for the most current three monitoring years; however, as shown in Table 3.2-2, violations did occur at the listed stations for monitored values for O₃, PM_{2.5}, NO₂ and Pb, which exceed the form of the federal standard concentration levels at one or more monitoring stations in the SCAB.

Summary data of maximum ambient levels of criteria pollutants for which the MDAB is nonattainment (e.g., O₃) that are monitored within the basin are presented in Table 3.2-3.

Table 3.2-3: Mojave Desert Air Basin Monitored Ozone Concentrations – Lancaster Monitoring Station

Year	Maximum 1-HR Concentration (ppm) ¹	Design Value (ppm) ²	Maximum 8-HR Concentration (ppm) ¹	Design Value (ppm) ²
1990	0.15	0.14	0.106	0.105
1991	0.14	0.14	0.111	0.105
1992	0.17	0.16	0.137	0.11
1993	0.16	0.16	0.127	0.113
1994	0.14	0.16	0.112	0.113
1995	0.14	0.141	0.112	0.108
1996	0.13	0.138	0.104	0.103
1997	0.12	0.129	0.101	0.098
1998	0.16	0.137	0.118	0.097
1999	0.10	0.137	0.083	0.089

Table 3.2-3: Mojave Desert Air Basin Monitored Ozone Concentrations – Lancaster Monitoring Station

Year	Maximum 1-HR Concentration (ppm) ¹	Design Value (ppm) ²	Maximum 8-HR Concentration (ppm) ¹	Design Value (ppm) ²
2000	0.14	0.139	0.117	0.092
2001	0.15	0.128	0.102	0.091
2002	0.16	0.128	0.107	0.100
2003	0.16	0.13	0.120	0.100
2004	0.12	0.13	0.101	0.100
2005	0.13	0.127	0.10	0.098
2006	0.13	0.123	0.11	0.096

Source: Antelope Valley Air Quality Management District (AVAQMD) Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-Attainment Area) (AVAQMD 2008).

¹. Notes: parts per million (ppm)

². A design value is a statistic that describes the air quality status of a given location relative to the level of the NAAQS. It is used to designate and classify non-attainment areas and to assess progress towards meeting the NAAQS.

As shown in Table 3.2-3, monitored levels have been trending toward the compliant design values for the 1-hour and 8-hour NAAQS for O₃; however, the basin remains in noncompliance for this criteria pollutant.

3.2.1.4 Fugitive Dust, Particulate Matter and Toxic Air Contaminants

Fugitive dust is particulate matter, which becomes airborne and has the potential to adversely affect human health or the environment. The most common forms of particulate matter are known as coarse particles with a diameter of 10 microns or less (PM₁₀), coarse particles, and fine particles with a diameter of 2.5 microns or less (PM_{2.5}). Fugitive dust is generated mainly from construction activities such as earth-moving, paved road trackout, driving on haul roads, and excavation.

The 2009 USEPA *Integrated Science Assessment for Particulate Matter* (USEPA. EPA/600/R-08/139F) has identified the adverse impacts of particulate matter air pollution on increased illness (morbidity) and increased death rates (mortality). Correlations have been established between elevated ambient particulate matter levels and respiratory infections, asthma attacks, and the number of hospital emissions. PM_{2.5} has been linked in studies to reduction in lifespan, mortality from lung cancer, cardiovascular and respiratory diseases, school and kindergarten absences, and increased asthma medication use by children and adults.

Toxic air contaminants (TACs) include 187 pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. A wide range of sources, from industrial plants to households emit TACs. Among these TACs are diesel particulates, which, along with 1,3 butadiene and benzene, are one of the top three contributors to the potential cancer risk from motor vehicle emissions.

3.2.1.5 Class I Areas

Construction activities contribute to visibility concerns in nonattainment and maintenance areas primarily through PM_{2.5} and NO_x emissions, which contribute to the formation of secondary PM_{2.5}. Under the provisions of the CAA, USEPA has designated a number of areas in the State of California, including national parks and wilderness areas, as Mandatory Class I Federal Areas where visibility is an important value. These mandatory Class I areas are listed in 40 CFR 81.406. Under the USEPA Regional Haze Rule (RHR), states must establish goals to improve visibility in Class I areas and develop long-term strategies to reduce emissions of air pollutants that cause visibility impairment. These goals are outlined in the state implementation plans.

Of the mandatory Class I areas, San Gabriel Wilderness and Cucamonga Wilderness are the closest to the Project. The nearest boundary of the San Gabriel Wilderness located in Los Angeles County is approximately 1.5 miles north of the Pine Mountain site (PMT). The nearest boundary of the Cucamonga Wilderness located in San Bernardino County is approximately 3 miles northeast from the Sunset Ridge sites (SUN, SUN2). The proposed improvements are not anticipated to have any measurable air quality impact on Class I federal areas. These areas are also shown in Figure 3.2-1.

3.2.2 Regulatory Setting

3.2.2.1 Federal Regulatory Setting

The CAA of 1970, amended in 1990, is the federal law that governs air pollution. As discussed in Section 3.2.1.2, USEPA is responsible for establishing NAAQS for the following six criteria pollutants: CO, O₃, NO₂, SO₂, particulates (PM₁₀ and PM_{2.5}), and Pb. The State of California has developed CAAQS for these criteria pollutants which are more protective of the public health in some cases, such as PM_{2.5/10} and O₃. Table 3.2-4 summarizes the NAAQS and CAAQS for these criteria pollutants.

Table 3.2-4: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard ¹	National Standard ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
Ozone (O ₃)	1 hour	0.09 ppm	–	Same as Primary Standard
	8 hours	0.070 ppm	0.075ppm	
Respirable Particulate Matter (PM ₁₀) ⁶	24 hours	50 $\mu\text{g}/\text{m}^3$	150 $\mu\text{g}/\text{m}^3$	Same as Primary Standard
	Annual	20 $\mu\text{g}/\text{m}^3$	–	
Fine Particulate Matter (PM _{2.5}) ⁶	24 hours	–	35 $\mu\text{g}/\text{m}^3$	Same as Primary Standard
	Annual	12 $\mu\text{g}/\text{m}^3$	12 $\mu\text{g}/\text{m}^3$	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	–
	8 hours	9 ppm	9 ppm	–

Table 3.2-4: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard ¹	National Standard ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
	8 hours (Lake Tahoe)	6 <u>ppm</u>	–	–
Nitrogen Dioxide (NO ₂) ⁷	1 hour	0.18 <u>ppm</u>	100 ppb	–
	Annual	0.03 ppm	0.053 <u>ppm</u>	Same as Primary Standard
Sulfur Dioxide (SO ₂) ⁸	1 hour	0.25 <u>ppm</u>	75 ppb	–
	3 hours	–	–	0.5 ppm
	24 hours	0.04 <u>ppm</u>	0.14 ppm (for certain areas) ¹⁰	–
	Annual	–	0.030 ppm (for certain areas) ¹⁰	–
Lead (Pb) ^{9,10}	30-Day Average	1.5 <u>µg/m³</u>	–	–
	Calendar Quarter	–	1.5 <u>µg/m³</u> (for certain areas) ⁽¹⁰⁾	Same as Primary Standard
	Rolling 3-Month Average	–	0.15 <u>µg/m³</u> ⁽⁶⁾	
Visibility Reducing Particles ¹¹	8 hours	Extinction coefficient 0.23 per kilometer – visibility of ten miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	No National Standard	
Sulfates	24 hours	25 <u>µg/m³</u>		
Hydrogen Sulfide	1 hour	0.03 ppm		
Vinyl Chloride ⁹	24 hours	0.01 ppm		

Sources: CARB 2013a.

Notes: ppm = parts per million; µg/m³ = micrograms per cubic meter; ppb = parts per billion

A dash (-) signifies that there is no standard for this pollutant

1. California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, suspended particulate matter (PM₁₀ and PM_{2.5}), and visibility reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current

be achieved through district-level air quality management plans that are incorporated into the state implementation plan (SIP).

The CARB traditionally has established state air quality standards, maintained oversight authority in air quality planning, developed programs for reducing emissions from motor vehicles, developed air emission inventories, collected air quality and meteorological data, and approved SIPs.

The California CAA focuses on attainment of CAAQS and requires designation of attainment and nonattainment areas with respect to these standards. The act also requires that local and regional air districts expeditiously adopt and prepare air quality attainment plans (Clean Air Plan) if the district violates CAAQS for O₃, CO, SO₂, or NO₂. No locally prepared attainment plans are required for areas that violate state PM₁₀ standards. CARB is responsible for developing plans and projects that will comply with the state PM₁₀ standards.

USEPA is working with CARB and other state, local, and tribal governments to reduce releases of TACs to the environment. Similar to the federal program, a chemical becomes a regulated TAC after it is identified by CARB's California Air Toxics Program, assessed for its potential for human exposure, and evaluated for its health effects on humans. CARB has listed approximately 200 toxic substances, including those identified by USEPA, which are identified on the California Air Toxics Program's TAC List.

3.2.2.3 Local Regulatory Setting

The proposed Project is located within portions of the MDAB under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD) and portions of the SCAB under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) (see Figure 3.2-1). These agencies regulate air pollution and operate air monitoring stations throughout the air basins. The Project would need to adhere to the following AQMD rules and regulations:

AVAQMD

AVAQMD Regulation IV, Rule 403 (2010) – Fugitive Dust

This regulation was promulgated by the AVAQMD to reduce the amount of particulate matter entrained (suspended) in the ambient air as a result of man-made Fugitive Dust sources by prescribing actions to prevent, reduce, or mitigate Fugitive Dust emissions. The rule covers activities that are potential sources of dust such as vehicle track-out from a construction site, earth-moving operations, demolition operations, and disturbed open areas of three or more acres.

AVAQMD Regulation IV, Rule 404 (1986) – Particulate Matter – Concentration

This regulation generally sets concentration limits for the discharge of particulate matter in the air.

AVAQMD Regulation XI, Rule 1110.2 (2003) – Emissions from Stationary, Non-road, and Portable Internal Combustion Engines

This regulation sets general emissions limits on oxides of nitrogen (NO_x), volatile organic compounds (VOCs), and CO for stationary and portable internal combustion engines (ICEs). Owners/operators of ICEs that exceed prescribed limits must be replaced with an electric motor or removed from service.

AVAQMD Regulation XIV, Rule 1401 (2006) – New Source Review for Toxic Air Contaminants

This regulation sets forth the requirements for preconstruction review of all new, modified, relocated or reconstructed facilities which emit or have the potential to emit any Hazardous Air Pollutant, Toxic Air Contaminant, or Regulated Toxic Substance.

AVAQMD Regulation XIV, Rule 1403 (1994) – Asbestos Emissions from Demolition/Renovation Activities

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).

SCAQMD

SCAQMD Regulation IV, Rule 403 (2005) – Fugitive Dust

Similar to the AVAQMD regulation, this regulation intends to reduce the amount of particulate matter entrained in the ambient air from man-made Fugitive Dust sources by prescribing actions to prevent, reduce or mitigate Fugitive Dust emissions.

SCAQMD Regulation IV, Rule 404 (1986) – Particulate Matter – Concentration

Similar to the AVAQMD regulation, this regulation generally sets concentration limits for the discharge of particulate matter in the air.

SCAQMD Regulation XI, Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines

This regulation replaces Rule 1110.1 and regulates general emissions limits on NO_x, VOCs and CO from engines. Owners/operators of engines that exceed prescribed limits must be replaced with an electric motor or removed from service.

SCAQMD Regulation XIV, Rule 1401 (2015) – New Source Review of Toxic Air Contaminants

This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants.

SCAQMD Regulation XIV, Rule 1403 (2007) – Asbestos Emissions from Demolition/Renovation Activities

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.

3.2.3 Significance Criteria

The following significance criteria were used in the air quality analysis. Significance criteria established by the applicable air quality management or air pollution control district, e.g., AVAQMD and SCAQMD were also relied upon to make the following determinations:

- 1) Would the project conflict with or obstruct implementation of the applicable air quality plan?
- 2) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- 3) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for O₃ precursors)?
- 4) Would the project expose sensitive receptors to substantial pollutant concentrations?
- 5) Would the project create objectionable odors affecting a substantial number of people?

3.2.3.1 AVAQMD Significance Thresholds

Project air quality impacts within the AVAQMD would be significant if the project triggers or exceeds the following evaluation criteria:

Generates total emissions (direct and indirect) in excess of the thresholds presented in Table 3.2-5

Generates a violation of any air quality standard when added to the local background

Does not conform with the applicable attainment or maintenance plan(s)

Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1

In general, the district considers Criterion 1 to be appropriate to the assessment of most projects (AVAQMD 2011); therefore, the significance thresholds presented in Table 3.2-5 were used to determine whether the proposed Project's air quality impacts would be significant, as discussed in greater detail below. Annual and daily emissions thresholds identified in Table 3.2-5 allow for the evaluation of a multi-phased project (one having a construction and an operational phase) with phases less than one year in duration compared to the daily limits. Criterion 4 was evaluated along with the Table 3.2-5 thresholds to determine whether sensitive receptors would be exposed to substantial pollutant concentrations, as discussed in detail under Impact AQ-4.

Table 3.2-5: AVAQMD Significance Thresholds

Pollutant	Tons/Year	
	Annual Threshold (tons)	Daily Threshold (pounds)
CO	100.0	548
NO _x	25.0	137
VOC	25.0	137
SO _x	25.0	137
PM ₁₀	15.0	82
PM _{2.5}	15.0	82
H ₂ S	10.0	54
Pb	0.6	3

Source: AVAQMD CEQA and Federal Conformity Guidelines (August 2011)

3.2.3.2 SCAQMD Significance Thresholds

The SCAQMD has also developed emissions thresholds for projects with air quality impacts. Similar to the analysis of proposed Project sites located within the MDAB under AVAQMD jurisdiction, the thresholds presented in Table 3.2-6 were determined to be appropriate for assessing the significance of both construction and operational air quality impacts for proposed Project sites located within the SCAB and under SCAQMD jurisdiction. The listed thresholds were used to evaluate the Project's impacts on air quality, specifically as they relate to significance criteria 1 through 4 in Section 3.2.3.1.

Table 3.2-6: SCAQMD Significance Thresholds

Pollutant	Mass Daily Thresholds	
	Construction	Operation
NO _x	100 lbs./day	55 lbs./day
VOC	75 lbs./day	55 lbs./day
PM ₁₀	150 lbs./day	150 lbs./day
PM _{2.5}	55 lbs./day	55 lbs./day
SO _x	150 lbs./day	150 lbs./day
CO	550 lbs./day	550 lbs./day
Pb	3 lbs./day	3 lbs./day
Toxic Air Contaminants (TACs), and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	<ul style="list-style-type: none"> • Maximum Incremental Cancer Risk greater than or equal to 10 in 1 million • Cancer Burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) • Chronic & Acute Hazard Index greater than or equal to 1.0 (project increment) 	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants ^a		

Table 3.2-6: SCAQMD Significance Thresholds

Mass Daily Thresholds		
Pollutant	Construction	Operation
NO ₂ 1-hour average Annual arithmetic mean	SCAQMD is in attainment: project is significant if it causes or contributes to an exceedance of the following attainment standards: <ul style="list-style-type: none"> • 0.18 ppm (state) • 0.03 ppm (state) and 0.0534 ppm (federal) 	
PM ₁₀ 24-hour average Annual average	10.4 µg/m ³ (construction) ^b and 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^c and 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment: project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month Average Quarterly Average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal) 1.5 µg/m ³ (federal)	
^a Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated. ^b Ambient air quality threshold based on SCAQMD Rule 403. KEY: lbs./day=pounds per day; ppm=parts per million; µg/m ³ =microgram per cubic meter Source: SCAQMD CEQA Handbook (SCAQMD 1993)		

3.2.4 Impact Analysis

Construction emissions were determined using the California Emission Estimator Model (CalEEMod) v 2013.2.2 developed for the California Air Pollution Control Officers Association (CAPCOA) by SCAQMD and other California air districts (EIC 2013). The model quantifies direct emissions from construction for a variety of land use projects. This analysis conservatively assumes a maximum construction activity scenario for each Project site to occur within a six week construction duration at each site.

Operational emissions associated with the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by the CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB and three proposed Project sites in the MDAB. The generator test would last

one hour at each site, and test days would be evenly distributed during each month of the year. For the analysis, an average of 15 trips per week to sites within the SCAB was assumed, with three maintenance trips on five weekdays and one additional weekday trip per month. For sites in the MDAB, the four maintenance trips were assumed to occur on the same day, once per month. Maintenance days are also assumed to coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B.

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

AVAQMD

The AVAQMD air quality plans considered in this analysis include the *AVAQMD 2004 Ozone Attainment Plan (State and Federal) (AVAQMD 2004 Ozone Plan) (AVAQMD 2004)*. The purpose of this plan was to (1) demonstrate that the AVAQMD would meet the primary O₃ NAAQS by the end of 2007; (2) present progress by the AVAQMD toward meeting all state planning milestones including attainment of the O₃ CAAQS; and (3) discuss the 8-hour O₃ NAAQS in preparation for a new nonattainment designation under a revised standard. Also considered in this analysis of Project air quality impacts is the *AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area) (AVAQMD 8-Hour Ozone Plan) (AVAQMD 2008)*. The purpose of this plan is to (1) demonstrate that the AVAQMD will attain the primary O₃ NAAQS by June 2021; (2) present progress by the AVAQMD toward meeting all required O₃ planning milestones and NAAQS and CAAQS; and (3) discuss the newest 0.075-ppm O₃ NAAQS in anticipation of a nonattainment designation for this revised standard.

Finally, the analysis considered the *AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to Health and Safety Code 39614(d) (AVAQMD PM Measures Plan) (AVAQMD 2005)*. The purpose of this plan is for the AVAQMD to develop a list of Best Available Control Technologies (BACT) either currently being implemented or for future consideration to control particulate emissions within the district. The rules listed in Section 3.2.2.3 above are included in the list developed in this plan.

SCAQMD

The SCAQMD air quality plan considered in this analysis is the *SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan) (SCAQMD 2013)*. The purpose of this plan is to demonstrate attainment of the PM_{2.5} 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O₃ SIP commitments to the USEPA to achieve emissions reductions from BACT, and to demonstrate attainment of the 1-hour O₃ CAAQS by 2022.

Construction Impacts

AVAQMD

The analysis indicates that emissions from the construction of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for the listed criteria pollutants including O₃ precursor NO_x (See Table 3.2-7). Therefore, the Project would not conflict with or obstruct implementation of the *AVAQMD 2004 Ozone Plan*, *AVAQMD 8-Hour Ozone Plan*, or the *AVAQMD PM*

Measures Plan. Construction impacts on the implementation of the AVAQMD plans would be less than significant.

Table 3.2-7: Construction Emissions for Simultaneous Construction of Three Proposed Sites¹ within MDAB

	Maximum Daily Emissions (lbs./day)					Maximum Annual Emissions (tons/year)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Unmitigated Emissions (per site)	0.65	7.13	5.34	0.97	0.30	0.01	0.11	0.08	0.02	<0.01
Total Emission for AVAQMD (3 sites) Unmitigated	2.6	28.5	21.4	3.9	1.2	0.04	0.44	0.32	0.08	<0.01
AVAQMD Threshold	137	137	548	82	82	25	25	100	15	15

1. The analysis conservatively evaluates maximum construction activity at each site.

SCAQMD

The analysis indicates that emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed significance thresholds for NO_x, a precursor for O₃, and could conflict with or obstruct implementation of the SCAQMD *Plan* resulting in a significant impact (see Table 3.2-8). The analysis also indicates that NO_x emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used (Mitigated Scenario). Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined (see Appendix B). The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six-week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin, with up to 28 sites under construction simultaneously without exceeding daily NO_x emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized (mitigated scenario). By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NO_x emissions limits.

Table 3.2-8: Construction Emissions for Simultaneous Construction of 51 Proposed Sites¹ Within SCAB

	Maximum Daily Emissions (lbs./day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Unmitigated Emissions (per site)	0.67	7.27	5.54	1.02	0.41
Mitigated Emissions (per site)	0.65	7.14	5.33	0.71	0.34
Total Emission for SCAQMD (51 sites) Unmitigated/Mitigated	40.87/39.65	443.5/435.5	337.9/325.1	62.22/43.31	25.01/20.74
SCAQMD Threshold	75	100	550	150	55
Exceeds Threshold	No	YES	No	No	No

¹. The analysis conservatively evaluates maximum construction activity at each site.

Mitigation Measures

AQ MM 1 No later than 12:00 p.m. on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NO_x emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) if combined NO_x emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which USEPA regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NO_x emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

Impacts After Mitigation

With implementation of Mitigation Measure AQ MM 1, the Project would not conflict or obstruct implementation of the *SCAQMD Plan*; therefore, construction impacts would be less than significant after mitigation.

Operation Impacts

AVAQMD

In general, operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators as described above. Emissions from the operation of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for the listed criteria pollutants including O₃ precursor NO_x and particulate matter (See Table 3.2-9). The Project would not conflict or obstruct implementation of the AVAQMD 2004 Ozone Plan, AVAQMD 8-Hour Ozone Plan and AVAQMD PM Measures Plan; therefore, Project impacts in the MDAB would be less than significant.

Table 3.2-9: Operational Emissions for Three Proposed Sites Within MDAB

Emissions Category	Maximum Daily Emissions (lbs.)					Maximum Annual Emissions (tons)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Maintenance	0.016	0.048	0.192	0.008	0.008	<0.01	<0.01	0.024	<0.01	<0.01
Generator Testing	0.016	0.064	0.088	0.008	0.008	<0.01	<0.01	<0.01	<0.01	<0.01
Total	0.032	0.112	0.28	0.016	0.016	<0.01	<0.01	0.032	<0.01	<0.01
AVAQMD Threshold (lbs./day)	137	137	548	82	82					
AVAQMD Threshold (tons/year)						25	25	100	15	15
Exceedance	No	No	No	No	No	No	No	No	No	No

SCAQMD

In general, operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators as described above. Emissions from the operation of proposed Project sites located in the SCAB will not exceed significance thresholds for the listed criteria pollutants (See Table 3.2-10). The Project would not conflict or obstruct implementation of the SCAQMD Plan; therefore, Project impacts in the SCAB would be less than significant.

Table 3.2-10: Operational Emissions for 51 Proposed Sites Within SCAB

Emission Category	Maximum Daily Emissions (lbs.)				
	ROG ¹	NO _x	CO	PM ₁₀	PM _{2.5}
Daily Maintenance	0.24	0.35	1.54	0.06	0.03
Generator Testing	0.18	0.96	1.29	0.10	0.10
Total Daily Emissions	0.42	1.31	2.83	0.16	0.13
SCAQMD Threshold (lbs./day)	55	55	550	150	55
Exceedance	No	No	No	No	No

1. Reactive organic gases are any compound of carbon and are an O₃ precursor regulated under the CAAQS.

Mitigation Measures

No mitigation measures are required.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The significance thresholds detailed in Table 3.2-5 (for the sites located in the MDAB) and Table 3.2-6 (for the SCAB sites) were used to determine whether the proposed Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Construction Impacts**AVAQMD**

As shown in Table 3.2-7, emissions from the simultaneous construction of the three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for the listed criteria pollutants (see Table 3.2-5). Per AVAQMD guidance (AVAQMD 2011), compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; therefore, Project construction impacts in the MDAB would be less than significant.

SCAQMD

As shown in Table 3.2-8, emissions from the simultaneous construction of the 51 proposed Project sites located in the SCAB would exceed significance thresholds for NO_x, a precursor for O₃, would result in violation of the SCAQMD threshold for daily NO_x emissions during construction and would contribute to the SCAB nonattainment status for O₃. The Project's construction emissions in the SCAB would be significant.

Mitigation Measures

Implementation of AQ MM 1 at sites within the SCAQMD would be required.

Impacts After Mitigation

With implementation of Mitigation Measure AQ MM 1, the Project would violate any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, construction impacts would be less than significant after mitigation.

Operation Impacts

Operational emissions of the proposed Project sites in the MDAB and SCAB (see Table 3.2-9 and Table 3.2-10, respectively) are less than significant and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, Project impacts would be less than significant in the MDAB and SCAB, respectively.

Mitigation Measures

No mitigation measures are required.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O₃ (NAAQS and CAAQS) and PM₁₀ (CAAQS) in the MDAB and O₃, PM_{2.5}, and PM₁₀ (CAAQS) in the SCAB. The significance thresholds detailed in Table 3.2-5 (AVAQMD) and 3.2-6 (SCAQMD) are the air quality standards considered in this analysis.

Construction Impacts

AVAQMD

As shown in Table 3.2-7, emissions from the simultaneous construction of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for O₃ and PM₁₀ (see Table 3.2-5). Per AVAQMD guidance (AVAQMD 2011), compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project construction emissions in the MDAB would be less than significant.

SCAQMD

As shown in Table 3.2-8, emissions from simultaneous construction of the proposed Project sites located in the SCAB would not exceed significance thresholds for PM_{2.5} or PM₁₀ but would exceed significance thresholds for O₃ precursor NO_x (see Table 3.2-6) and would result in cumulatively considerable net increases in O₃ from the NO_x emissions. Project construction emissions in the SCAB would be considered significant and would require the following mitigation.

Mitigation Measures

See mitigation measure AQ MM 1.

Significance After Mitigation

With implementation of Mitigation Measure AQ MM 1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NO_x from all construction activities at all proposed Project sites will not exceed the SCAQMD 100-pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, construction emissions of O₃ precursor NO_x would not result in cumulatively considerable net increases in O₃ in the SCAB; therefore, Project construction emissions in the SCAB would be less than significant.

Operation Impacts

AVAQMD

As shown in Table 3.2-9, operational emissions of the proposed Project sites in the MDAB would not exceed AVAQMD significance thresholds for O₃ and PM₁₀ (see Table 3.2-5). Per AVAQMD guidance (AVAQMD 2011), compliance with these significance thresholds is sufficient to demonstrate that operation of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project operational emissions in the MDAB would be less than significant.

SCAQMD

As shown in Table 3.2-10, operational emissions of the proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM_{2.5}, PM₁₀, or O₃ precursor NO_x (see Table 3.2-6). Compliance with these significance thresholds is sufficient to demonstrate that operation of the proposed Project sites in the SCAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project operational emissions in the SCAB would be less than significant.

Mitigation Measures

No mitigation measures are required.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

The AVAQMD considers residences, schools, daycare centers, playgrounds, and medical facilities to be sensitive receptor land uses. Exposure of sensitive receptors to substantial pollutant concentrations as defined above in Section 3.2.3.1, Criterion 4 is required for the following project types: (1) any industrial project within 1,000 feet; (2) a distribution center (40 or more trucks per day) within 1,000 feet; (3) a major transportation project (50,000 or more vehicles per day) within 1,000 feet; (4) a dry cleaner using perchlorethylene within 500 feet; and (5) a gasoline dispensing facility within 300 feet. While the Project

as proposed does not fall within one of these project types, the analysis of sites within the MDAB includes a qualitative assessment of pollutants that impact human health.

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of the pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD (SCAQMD 2011). The LSTs are modifications to the thresholds listed in Table 3.2-6 for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B lists the SRAs within which each of the proposed Project sites would be located, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants. All sites located in the SCAB were evaluated in comparison to the LSTs. The analysis of sites within the SCAB also includes a qualitative assessment of pollutants that impact human health.

Construction Impacts

The use of off-road heavy-duty diesel equipment by the Project for demolition, site grading and excavation, and concrete pad construction activities, as detailed in Appendix B, would result in the generation of diesel particulates (DPM) emissions. DPM were identified as a TAC by CARB in 1998. Other potential TAC sources associated with construction include the demolition of asbestos-containing materials and the excavation of naturally occurring asbestos (NOA) in soils.

According to the Consolidated Table of Office of Environmental Health Hazard Assessment (OEHHA)/CARB Approved Risk Assessment Health Values, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SCAQMD 2015; SMAQMD 2014); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA 2015). As discussed in Appendix B, the maximum construction activity scenario assumed at each site would have a six-week duration; therefore, further assessment of the potential cancer risk of the project is not warranted.

AVAQMD

Demolition of existing structures at proposed Project sites in the MDAB would be subject to AVAQMD Rule 1403. Rule 1403 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires lead agencies and their contractors to notify AVAQMD of any regulated renovation or demolition activity. By complying with AVAQMD Rule 1403, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the MDAB would lie outside areas within California that are more likely to contain NOA, according to a study completed by the California Department of Conservation, *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos* (California Department of Conservation 2000); therefore, NOAs are not discussed further in this assessment.

As shown in Table 3.2-7, emissions from construction of a worst-case composite site, which represents a maximum construction scenario, located in the MDAB would not exceed AVAQMD significance thresholds for the listed criteria pollutants. Per AVAQMD guidance (AVAQMD 2011), compliance with the criteria pollutant significance thresholds listed in Table 3.2-5 and the health -based risk assessment significance threshold established by AVAQMD Criterion 4 (Section 3.2.3.1) is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not result in sensitive receptor exposure to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

SCAQMD

Table 3.2-11 shows the daily construction emissions from a composite site (maximum construction scenario) in the vicinity of a residential and non-residential sensitive receptor in the SCAB where construction emissions would most closely approach the LSTs. All composite sites would comply with the revised thresholds established by the LSTs.

Table 3.2-11: Local Significance Thresholds – Construction and Operations Emissions for Composite Sites within SCAQMD Sensitive Receptor Area

Site ID	Receptor	Distance (feet)	SRA	Local Significance Thresholds (lbs./day)			
				NO _x	CO	PM ₁₀	PM _{2.5}
LASDCSN	Single-Family Home	39	4 - South Coastal LA County	57	585	4	3
PVC	School	417	3 – Southwest Coastal LA County	139	2,228	56	21
SCAQMD Significance Thresholds				100	550	150	55
Construction Emissions (lbs./day)				NO_x	CO	PM₁₀	PM_{2.5}
Composite Site (Maximum Construction Scenario)				7.27	5.54	1.02	0.41
Operation Emissions (lbs./day)				NO_x	CO	PM₁₀	PM_{2.5}
Composite Site				0.016	0.022	< 0.01	< 0.01
Exceeds LST				No	No	No	No

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these

activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA, according to a study completed by the California Department of Conservation (California Department of Conservation 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance (SCAQMD 1993), compliance with the local significance thresholds for criteria pollutants listed in Table 3.2-11 and Table 9 in Appendix B and with the health-based risk assessment significance thresholds listed in Table 3.2-6 is sufficient to demonstrate that construction of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

The monthly one hour test of the backup generator at each proposed Project site would generate DPM emissions. Emergency operation of the backup generators, which is anticipated to have a 200-hour continuous operational capacity, would also generate DPM emissions. No other operational sources of these or other TACs would occur.

According to the OEHHA, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SMAQMD 2014; SCAQMD 2015); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA 2015). The duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project is not warranted.

AVAQMD

As shown in Table 3.2-9, operational emissions of the proposed Project sites in the MDAB would not exceed AVAQMD significance thresholds for the listed criteria pollutants (see Table 3.2-5). Per AVAQMD guidance (AVAQMD 2011), compliance with these significance thresholds and with the health-based risk assessment significance threshold established by AVAQMD Criterion 4 (Section 3.2.3.1) is sufficient to demonstrate that operation of the proposed Project sites in the MDAB would not result in sensitive receptor exposure to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

SCAQMD

As shown in Table 3.2-11 and Table 9 in Appendix B, operational emissions of the proposed Project sites in the SCAB would not exceed SCAQMD LSTs for the listed criteria pollutants. Per SCAQMD guidance (SCAQMD 1993), compliance with these LSTs and with the health-based risk assessment significance thresholds listed in Table 3.2-6 is sufficient to demonstrate that operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measures

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?**Construction Impacts**

Project construction emissions of dust from demolition activities and/or excavated soil have the potential to generate objectionable odors; however, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody facilities, foundry/metal processing, wastewater/water treatment, and landfills, which together comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use account for only 3 percent of complaints (Curren 2012). The construction of proposed Project sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to AVAQMD Rule 402 or SCAQMD Rule 402; therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody facilities, foundry/metal processing, wastewater/water treatment, and landfills, which together comprise approximately 55-percent of all complaints (Curren 2012). The operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to AVAQMD Rule 402 or SCAQMD Rule 402. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

3.2.4.1 No Project Alternative

Under the No Project Alternative, none of the 54 proposed Project sites would be constructed. Therefore, no criteria pollutant emissions or impacts to sensitive receptors would occur from

construction equipment, worker commuting vehicles, or material transport trucks. No mitigation measures would be needed to ensure that emission thresholds are not exceeded. Because no new diesel generators would be installed under the No Project Alternative, no increase in diesel combustion emissions from those sources would occur; however, existing communication sites would continue to operate and be inspected, maintained, and repaired.

3.2.5 Cumulative Impacts

The AVAQMD and SCAQMD emission thresholds were set to ensure that individual projects, when combined with other air pollution-emitting activities in their jurisdictions, do not compromise compliance with NAAQS and CAAQS. In developing their attainment plans, the air districts have prepared inventories of emissions for stationary sources and mobile sources and made various assumptions about population growth, housing growth and economic activity to develop future emissions inventories.

AVAQMD

The AVAQMD 2004 Ozone Plan developed emissions inventories for stationary sources, which include large emitters (point sources) of ozone precursors (VOCs, NO_x), and small emitters (area sources) of ozone precursors, which include residential water heaters, architectural coatings, consumer products, etc., distributed across the district. Operational emissions for the Project, resulting from monthly testing of backup generators at all five proposed sites in the MDAB, would contribute to area source emissions within the district. The AVAQMD Ozone 2004 Plan emission inventory was developed for a 2002 baseline year and future plan years (2005, 2007). Subsequently, the AVAQMD 8-Hour Ozone Plan updated these inventories for future plan years (2011, 2014, 2017, and 2020). Calculated emissions for 2014 through 2020 are summarized in Table 3.2-12. The table also shows the contribution of Project emissions to the area source inventories for future years.

Table 3.2-12: Contribution of Emissions for Three Proposed Sites to Area and Mobile Source Emissions within the AVAQMD

Emissions Scenario	Maximum Daily Emissions (tons/day)	
	VOC ¹	NO _x
AVAQMD Area Sources 2014 ²	4.97	0.40
AVAQMD Area Sources 2017 ²	5.27	0.41
AVAQMD Area Sources 2020 ²	5.58	0.42
Project Generator Testing (percent of all areas sources, 2017 & 2020)	<0.01%	<0.01% - 0.01%
AVAQMD Mobile Sources 2014 ^{2,3}	10.01	17.51
AVAQMD Mobile Sources 2017 ^{2,3}	9.46	15.01
AVAQMD Mobile Sources 2020 ^{2,3}	9.19	13.13
Project Construction and Maintenance Trips (percent of all mobile sources, 2017 & 2020) ⁴	<0.01%	<0.01% - 0.01%

Table 3.2-12: Contribution of Emissions for Three Proposed Sites to Area and Mobile Source Emissions within the AVAQMD

Emissions Scenario	Maximum Daily Emissions (tons/day)	
	VOC ¹	NO _x
^{1.} Reactive organic gases are any compound of carbon and are an O ₃ precursor regulated under the CAAQS and are referred to as VOCs at the federal level. ^{2.} Source: AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Non-attainment Area) (AVAQMD 2008). ^{3.} On-road and off-road emissions combined. ^{4.} Project construction emissions were amortized over 2 years for 2017 projections and 6 years for 2020 projections.		

The AVAQMD 8-Hour Ozone Plan also developed emissions inventories for mobile sources, which include on-road and off-road sources of ozone precursors (VOCs, NO_x) within the district. On-road emissions were calculated from transportation activity data provided by the South Coast Association of Governments (SCAG), and off-road emissions were calculated using CARB's In-Use Off-Road Fleet Inventory model (off-road model) for construction, mining, gardening, and agricultural equipment. Construction emissions for the Project include worker vehicle trips to all five proposed sites and emissions from construction equipment operation. Operational emissions for the Project would result from worker vehicle trips to conduct monthly testing of backup generators and concurrent biannual maintenance at all five proposed sites. Emissions from each of these trips would contribute to mobile source emissions within the district. The AVAQMD 8-Hour Plan updated these inventories for future plan years (2011, 2014, 2017, and 2020). Calculated emissions for 2014 through 2020 are summarized in Table 3.2-12. The table also shows the contribution of Project emissions to the project areas source inventories for future years.

As shown in Table 3.2-12, Project contributions to stationary (area) and mobile source emissions within the AVAQMD are less than 0.01 percent. The contribution of the Project to cumulative stationary and mobile source emissions would not conflict with or obstruct implementation of the AVAQMD 8-Hour Ozone Plan. Furthermore, the Project is not growth-inducing and would not result in an economic activity that would be inconsistent with the assumptions used in forecasting district-wide emissions. Therefore, the Project would have no significant cumulative impacts to air quality within the jurisdiction of the AVAQMD.

SCAQMD

The SCAQMD Plan developed emissions inventories for stationary sources, which include large emitters (point sources) with annual emissions of 4 tons or more of VOCs, NO_x, sulfur oxides (SO_x), and particulates (PM_{2.5}/PM₁₀) or annual emissions of CO over 100 tons (point sources), and small emitters (area sources). Operational emissions for the Project, resulting from monthly testing of backup generators at all 54 proposed sites in the SCAB, would contribute to area source emissions within the district. The SCAQMD Plan emission inventory area source estimates for the 2008 baseline year of the plan and future plan years (2023, 2030) are summarized in Table 3.2-13. The table also shows the potential relative contribution of Project emissions to the area source inventories for future years.

Table 3.2-13: Contribution of Emissions for 54 Proposed Sites to Area and Mobile Source Emissions within the SCAQMD

Emissions Scenario	Maximum Daily Emissions (tons/day)				
	VOC ¹	NO _x	CO	PM ₁₀	PM _{2.5}
SCAQMD Area Sources 2008 ²	109	50	115	--	31
SCAQMD Area Sources 2023 ²	110	35	126	--	36
SCAQMD Area Sources 2030 ²	58	4	11	--	19
Project Generator Testing (percent of all areas sources, 2023 & 2030)	<0.01%	<0.01% - 0.02%	<0.01% - 0.02%	--	<0.01%
SCAQMD Mobile Sources 2008 ^{2,3}	377	634	2,737	--	40
SCAQMD Mobile Sources 2023 ²	180	249	1,425	--	26
SCAQMD Mobile Sources 2030 ²	57	169	936	--	8
Project Construction and Maintenance Trips (percent of all mobile sources, 2023 & 2030) ⁴	<0.01%	<0.01%	<0.01%	--	<0.01%

¹. Reactive organic gases are any compound of carbon and are an O₃ precursor regulated under the CAAQS and are referred to as VOCs at the federal level.

². Source: *SCAQMD 2012 Final Air Quality Management Plan* (SCAQMD 2012).

³. On-road and off-road emissions combined. Construction emissions were amortized over 2 years for 2017 projections and 6 years for 2020 projections.

⁴. Project construction emissions were amortized over 7 years for 2023 projections and 14 years for 2030 projections.

The *SCAQMD Plan* also developed emissions inventories for mobile sources, which include on-road and off-road sources of VOCs, NO_x, sulfur oxides (SO_x), particulates (PM_{2.5}/PM₁₀), and CO within the district. On-road emissions were calculated from transportation activity data provided by the Southern California Association of Governments (SCAG), and off-road emissions were calculated using CARB's off-road model for construction, mining, gardening, and agricultural equipment. Construction emissions for the Project include worker vehicle trips to all 54 proposed sites and emissions from construction equipment operation. Operational emissions for the Project would result from worker vehicle trips to conduct biannual maintenance and monthly testing of backup generators at all 54 proposed sites. Emissions from each of these activities would contribute to mobile source emissions within the district. The *SCAQMD Plan* emission inventory mobile source estimates for the 2008 baseline year of the plan and future plan years (2023, 2030) are summarized in Table 3.2-13. The table also shows the contribution of Project emissions to the project area source inventories for future years.

As shown in Table 3.2-13, Project contributions to stationary (area) and mobile source emissions within the SCAQMD are less than 0.02 percent. Although the contributions could be considered relatively

minor, unmitigated construction emissions have the potential to exceed the SCAQMD significance thresholds. Therefore, the project's contribution to cumulative construction emissions in the SCAB would require the following mitigation.

Mitigation Measures

See mitigation measure AQ MM 1.

Significance After Mitigation

Application of AQ MM 1 would ensure the cumulative contribution of the Project to stationary and mobile source emissions would not conflict with or obstruct implementation of the *SCAQMD Plan*. Furthermore, the Project is not growth-inducing and would not result in an economic activity that would be inconsistent with the assumptions used in forecasting district-wide emissions. Therefore, the Project would have no significant cumulative impacts to air quality within the jurisdiction of the SCAQMD.

All construction projects that may be in progress or may start during the Project construction time frame in the MDAB and SCAB would be subject to BACT to control construction emissions. Emission thresholds were set to ensure that individual projects, when combined with other air pollution-emitting activities in their jurisdictions, do not compromise progress toward attainment of all NAAQS and CAAQS. Although the continued nonattainment status of the MDAB for O₃ (NAAQS/CAAQS) and PM₁₀ (CAAQS) and the continued nonattainment status of the SCAB for O₃ (NAAQS/CAAQS), PM_{2.5} (NAAQS/CAAQS), and PM₁₀ (CAAQS) are an indication of significant cumulative impacts of all projects in these basins, compliance for the Project with air emissions from construction, after implementation of AQ MM 1, and operation of proposed Project sites would remain below significance thresholds; and air emissions from the Project would not be cumulatively considerable.

3.3 Biological Resources

3.3.1 Environmental Setting

All proposed Project sites are located within the Southern California/Northern Baja Coast Ecoregion III, at an elevation range of approximately 14 to 8,487 feet above mean sea level. This ecoregion is defined by coastal and alluvial plains and mountains that historically were dominated by grasslands, coastal sage scrub, and chaparral vegetation communities, with oak and walnut woodlands dispersed throughout and white fir forest at the highest elevations (USEPA 2015); however, today the region has large-scale human development.

Prior to conducting field visits, biologists acquired ecological data and prepared lists of special status species that have the potential to occur in Los Angeles County or neighboring areas of San Bernardino County (for Site AJT) and may require species-specific impact analysis. Special status species includes any species identified by California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), or National Marine Fisheries Service (NMFS) as endangered, threatened, proposed, candidate, sensitive, or any other special status under the authorities of state or federal statutes, or as identified in local or regional plans, policies, or regulations; and any species that meets the California Environmental Quality Act (CEQA) Guidelines criteria for endangered, rare, or threatened. For sites located within the Angeles National Forest, U.S. Forest Service (USFS) Sensitive Species Lists were reviewed and incorporated. Local, regional, and state plans, policies, and regulations addressing biological resources, such as habitat conservation plans, natural community conservation plans, and wildlife linkage maps, were reviewed for applicability.

Data was compiled from the CDFW Natural Diversity Database (CNDDDB) (queries from March 17, 2014, March 4, 2015, and October 1, 2015); the CDFW California Rare Plant Ranks (CRPR); the USFWS Information Planning and Conservation (IPaC) System and critical habitat portal; NMFS online resources; and any Project-specific lists provided by USFWS or USFS. From these lists, species listed, proposed, or candidates for listing under the federal Endangered Species Act (ESA) were evaluated for their potential to occur at or near each proposed Project site, as were California fully protected species, California Endangered Species Act (CESA) listed species, rare plants listed under California Native Plant Protection Act (CNPPA), plants with a CRPR of 1 or 2 as identified by CDFW, CDFW species of concern, and sensitive species designated by USFS for sites on national forest lands. From this list of 173 plant species and 120 wildlife species, the potential species to be considered for each proposed Project site were evaluated at two levels: the overall county-wide list of species; and a target list of species recorded within 1 mile or up to 3 miles from each proposed Project site, taking species-specific factors into consideration (e.g., dispersal distance of California red-legged frog, wide-ranging flights by birds of prey, and downstream concerns for aquatic resources). A total of 112 plants and 71 wildlife species were identified for evaluation at the proposed Project sites.

Maps were developed to display general habitat, geographical characteristics, and vegetation communities surrounding each proposed Project site. This study area is defined as an area within an

approximately 500-foot radius projected from the center of the anticipated construction footprint within each proposed Project site. Vegetation communities within each study area were digitized using geographic information system (GIS) and aerial photo interpretation prior to site surveys.

Reconnaissance-level site surveys were conducted within each proposed Project site and study area by Jacobs biologists during the months of August, September, and October 2014. Qualified biologists surveyed each study area, including adjacent areas appropriate to the species potentially occurring in the area. Generally, species-specific protocol surveys were not conducted due to timing restrictions (inappropriate season), although species-specific habitat assessments were completed.

Data was collected using a handheld Trimble Yuma global positioning system (GPS) tablet. Photos and notes were taken at all sites; a plant list was recorded and relative abundance estimated for each species at each site; and plants were identified to the lowest taxonomic level (genus, species, or subspecies/variety) necessary to distinguish common plant species, noxious and invasive weeds, and special status plant species. General wildlife observations and detections of sign were also noted. Biologists field-verified the mapping of vegetation communities previously conducted by remote sensing and evaluated whether possible waters of the United States, other wetland habitats, riparian habitat, or other special habitats or vegetation communities were present in the general vicinity. Vegetation classification followed *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009). Determination of alliances was made by estimating the percent cover of all woody species and dominant herbaceous species for non-woody plant communities.

3.3.1.1 Vegetation Communities

Many of the proposed Project sites were located in rural areas on mountains, hills, or ridgetops, with one plant community on the xeric south-facing slopes and another community with taller, denser vegetation on the more mesic north-facing slopes or canyons. Other sites were located in urbanized areas and contained ornamental landscaping, bare areas, or ruderal species (weedy fields). All sites contained some level of development that included facilities, fencing, and cleared ground and asphalt, concrete, or bladed roadways. Most areas had some ornamental or nonnative vegetation. At many sites, the vegetation surrounding the developed facility was mowed or treated with herbicides to clear the area for fire fuel breaks. These areas were often mulched with the wood chips from the mower. The sites often contained nonnative species growing in cracks in the asphalt or concrete or in bladed areas. The amount of weeds was noted as light, moderate, or heavy. The weedy species present were also noted, as were any noxious species.

Vegetation within each study area was mapped using the Manual of California Vegetation's classification system (Sawyer et al. 2009). This system creates several hundred specific Alliances representing forests and woodlands, shrublands, and herbaceous vegetation. The alliances are identified by the most common one or two species and are named by the dominant species present. Tree communities are classified as either woodland (sparse) or forest (dense). Dense shrub communities are referred to as chaparral. Sparser shrub communities are referred to as scrub and typically occur along the coast and in the desert. For clarity and simplicity, alliances are grouped below into broader communities of similar

structure when applicable, so they can be easily related to wildlife habitat. Following is a general description of the vegetation communities and/or alliances observed within the study areas.

California Walnut Woodland

The community and alliance for California walnut woodlands/groves is the same. This community is limited to the southern California coast, mountains and valleys. Southern California black walnut (*Juglans californica* var. *californica*) grows as a volunteer in disturbed areas or as a mixed woodland community with coast live oak, white alder, Mexican elderberry, arroyo willow, and toyon. Southern California black walnut primarily grows on north-facing slopes and in mesic canyons. The common understory is nonnative grass, including wild oats, and chaparral shrubs.

Canyon Live Oak Riparian Forest

The community and alliance are the same. Canyon live oak riparian forest is found throughout California along stream benches and terraces in canyon bottoms and along steep, shallow, rocky soils in uplands. Canyon live oak (*Quercus chrysolepis*) was the dominant tree observed in this community. Other common species included Eastwood manzanita, Douglas fir, and California buckwheat. This community was identified along the Santa Clara River floodplain.

Coast Live Oak Woodland

The community and alliance are the same. Coast live oak woodland grows as a mosaic with nonnative grassland, coastal sage scrub, and chaparral. Coast live oak (*Quercus agrifolia*) grows primarily on north-facing slopes, canyons, and valley bottoms. It can grow with other oaks which may grow only as large shrubs. Other commonly observed mesic shrubs include bush monkeyflower, bush penstemon, big-leaf maple, arroyo willow, cottonwood, and canyon live oak. Sycamore and cottonwood dominate the broader more gravelly washes. Willows dominate the riparian areas with permanent water. In mesic canyons with intermittent streams, the oaks form a forest. Seep willow is common in disturbed canyons and washes. Coast live oak intergrades in drier habitat with interior live oak.

Chaparral (Chamise/Mixed/Montane)

The broad chaparral vegetation community includes three sub-communities (Mixed, Chamise, and Montane) and many alliances. Chaparral species have larger leaves and are less drought resistant than coastal sage species. Chaparral is found in varied topography depending on the dominant species and is identified in two-thirds of the study areas. Chaparral is found in disturbed areas, on deep to shallow soils, and/or on steep slopes. The following alliances identified in the study areas fall under the Mixed chaparral vegetation community: big-pod ceanothus, big-berry manzanita, birch-leaf mountain mahogany, California buckwheat scrub, canyon live oak chaparral, coffeeberry scrub, interior live oak, laurel sumac scrub, scrub oak chaparral, thick-leaved yerba santa scrub, and toyon chaparral. Big-berry manzanita is more common at the lower elevations, and Eastwood's manzanita is common at the higher elevations. The most common chaparral species observed during the surveys was laurel sumac.

One alliance fell under the Chamise chaparral community, the Chamise chaparral alliance. Chaparral dominated by chamise (*Adenostoma fasciculatum*) is common at the higher elevations and in mesic canyons. Other chaparral species include Our Lord's candle, toyon, redberry, and holly-leaf cherry. On south-facing and disturbed slopes and in sterile or poor soils, the most common chaparral species is California bush buckwheat. This species grows from the coastal hillsides to the desert valley hillsides.

One alliance, mountain whitethorn chaparral falls under the Montane chaparral community. The upper elevations on mountains are dominated by a tall, dense cover of shrubs dominated by chaparral whitethorn (*Ceanothus leucodermis*). Chaparral whitethorn is common in the San Gabriel Mountains.

Coastal Sage Scrub

The Coastal sage scrub community includes the following alliances: California buckwheat scrub, California sagebrush scrub, California sagebrush-California buckwheat scrub, Coastal prickly pear scrub, Coyote brush scrub, Lemonadeberry scrub, and White sage scrub. Vegetation grows on the drier sites on the hillsides adjacent to the coast. This community is dominated by species that quickly go leafless and dormant in the summer. Study areas were dominated by either California bush buckwheat or coast sagebrush. Coastal sage scrub is a mixed shrub community with white sage, black sage, purple sage, and encelia being the most common. As mentioned previously, the hilly topography creates many different habitats. Coastal sage scrub commonly grows adjacent to oak woodland, chaparral, and grassland communities. In coastal areas that have been heavily grazed, unpalatable species such as prickly pear becomes much more common. The vegetation on Santa Catalina Island and in the San Dimas area displays this cactus-dominated vegetation.

Elderberry Savanna

The community and alliance are the same for Elderberry Savanna/Blue elderberry stands. This community is found along stream terraces and bottomlands on gravelly alluvium that is intermittently flooded. Stands of blue elderberry (*Sambucus nigra*) are typically found in riparian and semi-riparian areas in the Santa Monica Mountains. Common species observed included skunkbrush (*Rhus trilobata*) and canyon live oak.

Jeffrey Pine Forest

The Jeffrey Pine Forest community and alliance are the same. This community is visually dominated by pine trees (*Pinus jeffreyi*) and has an understory of tall and low shrub species including chokecherry, manzanita, and buckwheat. Annuals are usually not frequent. This community is on the drier locations at the highest elevation sites.

Nonnative Grasslands/Semi-natural Herbaceous Stands

The nonnative grassland community includes the following Semi-natural herbaceous stands, a classification that is not quite equivalent to an alliance due to the dominance of non-native plants: annual brome grass, cheat grass, and wild oats grasslands. The grasslands of Los Angeles County have been exposed to frequent fires, disturbance by construction of roads, trails, and heavy grazing by cattle

and sheep. These conditions have resulted in changes in acreage of native grassland, coastal sage scrub, and chaparral. Grasslands in Los Angeles County are dominated by wild oats (*Avena fatua* and *A. barbata*) and brome grass (*Bromus rubens*, *B. diandrus*, *B. mollis*, and *B. tectorum*).

Ruderal

The Ruderal community classification is used to encompass ornamental, ruderal, ruderal/ornamental, and urban or built-up land mapping designations. In areas that have been bladed, the vegetation is dominated by nonnative grasses and forbs. The dominant nonnative grasses include brome grass. The most common forb is red-stemmed filaree. A long list of other forb species were encountered at the proposed Project sites. The most common are cheeseweed, prickly lettuce, bristly ox tongue, tumbleweed, tocolote, and biennial mustard.

Valley Oak Woodland

The community and alliance for Valley oak woodland is the same. Valley oak (*Quercus lobata*) is primarily a Central Valley species that creeps into northern Los Angeles County. In transitional areas, such as Los Angeles County, the southern edge of its range, it occurs with coast live oak, blue oak, and canyon live oak. The primary understory is nonnative grassland with chaparral and coastal sage scrub species in mesic habitats.

White Fir Forest

The community and alliance for White fir forest is the same, and also includes the snowberry shrubland alliance. In southern California, stands occur at higher elevations in the transverse ranges. This community occurs in more mesic sites than Jeffrey pine forest and is visually dominated by white fir (*Abies concolor*). Common understory plants include: whitethorn, golden currant, and snowberry. This community occurs with big cone Douglas fir in mesic north-facing canyons.

Table 3.3-1 identifies which vegetation communities are found within each of the study areas.

Table 3.3-1: Vegetation Communities within the Study Areas¹

Vegetation Community	Vegetation Alliance	Study Area(s)
California walnut woodland	California walnut grove	AGH, AJT, SDW
Chamise chaparral	Chamise chaparral	ENC1, JPK, JPK2 LACFCP11, LPC, MTL, MTL2, TOP, VPK
Coast live oak woodland	Coast live oak woodland	ENC1, LACF072
Coastal sage scrub	California buckwheat scrub	FTP, GRM, LEPS, MMC, WTR
	California sagebrush scrub	ENT, H-17A, LACFCP11, PWT, TWR
	California sagebrush-California buckwheat scrub	PHN
	Coastal prickly pear scrub	BJM, SDW
	Coyote brush scrub	RIH
	Lemonadeberry scrub	FTP

Table 3.3-1: Vegetation Communities within the Study Areas¹

Vegetation Community	Vegetation Alliance	Study Area(s)
	White sage scrub	DPK
Elderberry savannah	Blue elderberry stands	GMT
Jeffrey pine forest	Jeffrey pine Forest	TMT
Mixed chaparral	Big-pod ceanothus chaparral	H-69B
	Big-berry manzanita	LACFCP09, MAM, MML, WMP
	Birch-leaf mountain mahogany chaparral	SPN, WTR
	Canyon live oak chaparral	BUR, BUR1, BUR2, BUR3, JOP, MAM, MML
	Canyon live oak riparian/woodland	LACFCP09, GMT, LPC
	Coffeeberry scrub	MTL, MTL2
	Interior live oak chaparral	SUN, SUN2
	Laurel sumac scrub	DPK, H-17A, JPK, LACFCP08, LEPS, PHN, RIH
	Scrub oak chaparral	CPK, ENT, VPK
	Thick-leaved Yerba Santa scrub	JOP
Toyon chaparral	GRM, TWR	
Montane chaparral	Mountain whitethorn chaparral	PMT
Non-native grassland	Annual brome grass Semi-natural herbaceous stands	TPK
	Cheatgrass Semi-natural herbaceous stands	MMC
	Wild oats Semi-natural herbaceous stands	OAT
Ornamental	Ornamentals	BUR1, BUR2, LACF051, LARICSHQ, PASPD01, PDC, SIM, WAD, WHD, WS1, ZHQ
Ruderal & Ornamental	Ruderal & ornamental	ENC1, LACFCP11, SDW, SGH
Valley oak woodland	Valley oak woodland	OAT
White fir forest	Snowberry shrubland	FRP
	White fir Forest	FRP

¹ The study area is defined by a 500-foot radius around each proposed Project site.

Table 3.3-2 provides the total acreage of each vegetation community found within the proposed Project study areas.

Table 3.3-2: Summary of Acreage by Vegetation Community as Mapped within the Study Areas¹

Vegetation Community	Total Acres in Study Areas
Annual brome grass	14.7
Big-pod ceanothus chaparral	14.5
Big-berry manzanita chaparral	35.2

Table 3.3-2: Summary of Acreage by Vegetation Community as Mapped within the Study Areas¹

Vegetation Community	Total Acres in Study Areas
Birch-leaf mountain mahogany chaparral	23.0
Blue elderberry stands	6.9
California buckwheat scrub	43.5
California sagebrush-California buckwheat scrub	8.8
California sagebrush scrub	38.5
California walnut groves	26.2
Canyon live oak chaparral	49.9
Canyon live oak riparian woodland	4.5
Canyon live oak woodland	14.9
Chamise chaparral	63.7
Cheatgrass grassland	1.4
Coast live oak woodland	14.3
Coastal prickly pear scrub	17.2
Coffeeberry scrub	5.1
Coyote brush scrub	3.1
Interior live oak chaparral	16.6
Jeffrey pine forest	14.5
Laurel sumac scrub	53.0
Lemonadeberry scrub	6.8
Mountain whitethorn chaparral	14.1
Ornamental	124.1
Ruderal and Ornamental	197.8
Scrub oak chaparral	27.3
Snowberry shrubland	5.1
Thick-leaved Yerba Santa scrub	8.1
Toyon chaparral	15.3
Urban or Built-up Land	18.0
Valley oak woodland	5.7
White fir forest	9.9
White sage scrub	10.7
Wild oats grasslands	8.8

¹ The study area is defined by a 500-foot radius around each proposed Project site.

3.3.1.2 Special Status Animals and Plants

Special status species receive specific designations based on the federal statutory authorities (e.g., ESA), state statutory authorities (e.g., CESA; California Fish and Game Code [FGC]), or agency regulations and policy (e.g., USFS sensitive species). An accounting of these and other statutes and policies that affect the management of biological resources are provided in the section addressing Regulatory Setting (Section 3.3.2). Typically, species with special designations require species-specific analysis in project evaluation, and agencies maintain records of where these species have been known to occur. The CDFW maintains the CNDDDB as a repository of species occurrence data to be used in project evaluation.

Special status species designations as assigned under state and federal statutory authorities and land and resource management agencies are as follows:

Federal Endangered Species Act (ESA)

- E – Endangered
- T – Threatened
- P – Proposed
- C – Candidate
- CH – Critical Habitat

Bald and Golden Eagle Protection Act (BGEPA)

Magnuson-Stevens Fishery Conservation and Management Act (MSA)

- EFH – Essential Fish Habitat

California Endangered Species Act (CESA)

- E – Endangered
- T – Threatened
- C – Candidate

State of California

- FP – Fully Protected

California Native Plant Protection Act (CNPPA)

- Rare

California Department of Fish and Wildlife (CDFW)

- SSC – Species of Special Concern

CDFW California Rare Plant Ranks⁶ (CRPR)

- 1A – Plants presumed extirpated in California and either rare or extinct elsewhere
- 1B – Plants Rare or Endangered in California and elsewhere
- 2A – Plants presumed extirpated in California but more common elsewhere
- 2B – Plants Rare, Threatened, or Endangered in California, but more common elsewhere

U.S. Forest Service (USFS)

- S – Sensitive – Species that, as determined by qualified professionals, meet the CEQA criteria for endangered, rare or threatened. (CEQA Guidelines §15380.)

A review of the basic ecology and distribution of each of the 186 special status species that may occur in association with study areas is provided in Appendix B. This information was used to support an initial evaluation of which species may be present in each study area and whether that species may be directly or indirectly impacted by Project-related actions.

⁶ CRPR Ranks 3 and 4 are not included here as they are not designated as rare.

Table 3.3-3 provides a description of each study area and the list of special status species documented within 1 mile of each proposed Project site; however, this list does not include the full list of species considered in the evaluation for each study area, since not all special species are tracked by the CNDDDB (e.g., California condor). Some species are more wide-ranging, and greater distances need to be considered (e.g., golden eagle, red-legged frog dispersal distance, downstream concerns for aquatic resources). The distribution of each species is not definitive or fully represented by recorded occurrence data, so on-site evaluations were used to identify habitat for species that have not been recorded from the general vicinity.

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
AGH	Site AGH is located in the city of Agoura Hills at the end of a ridgeline within a largely undeveloped complex of hills surrounded by residential development; slopes are fairly steep, and no washes are present. The vegetation community includes coastal sage scrub, California black walnut woodland on north-facing slopes with a few trees along the edge of the access road, and many weedy grasses and forbs throughout.	none	NA
AJT	Site AJT is located in a mostly rural setting in the city of Chino Hills on rolling hills of heavily grazed nonnative grassland and sparse California Black Walnut (<i>Juglans californica</i>) Woodland. Trees are generally denser on north-facing slopes. Nonnative grasses and herbaceous species dominate the understory with milk-thistle (<i>Silybum marianum</i>), biennial mustard (<i>Hirshfeldia incana</i>), horehound (<i>Marrubium vulgare</i>), coyote melon (<i>Cucurbita foetidissima</i>), and Indian tobacco (<i>Nicotiana glauca</i>).	golden eagle ⁴ (<i>Aquila chrysaetos</i>)	BGEPA CDFW-FP
		long-eared owl (<i>Asio otus</i>)	CDFW-SSC
		western pond turtle (<i>Emys marmorata</i>)	CDFW-SSC
ASD	Site ASD is located in a highly urbanized setting with extensive paved surfaces and minimal lawn and landscape vegetation within the Cerritos Auto Mall.	western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>)	ESA-T CA-E
BJM	Site BJM is located on Black Jack Peak on Santa Catalina Island on a hilltop that has been leveled and mostly paved to support the existing facilities. The vegetation in the area has been heavily impacted by overgrazing and long-term drought, resulting in bare soil and an increase in non-palatable plant species. Adjacent to the site is coastal sage scrub bisected by hiking trails and bike paths. The site contains many native and nonnative mature trees. Diagnostic woody shrubs include coast prickly pear (<i>Opuntia littoralis</i>), laurel sumac (<i>Malosma laurina</i>), toyon (<i>Heteromeles arbutifolia</i>), coyote bush (<i>Baccharis pilularis</i>), bush monkeyflower (<i>Diplacus aurantiacus</i>), lemonadeberry (<i>Rhus integrifolia</i>), and island oak (<i>Quercus pacifica</i>).	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		island rush-rose (<i>Crocotanthemum greenei</i>)	ESA-T CRPR-1B.2
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus ssp. floribundus</i>)	CRPR-1B.2
		Santa Catalina Island manzanita (<i>Arctostaphylos catalinae</i>)	CRPR-1B.2
		Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1
		Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1
BUR	Site BUR is located at the top of Burnt Peak within the Angeles National Forest in association with existing facilities. The site is located within a dense and extensive stand of canyon live oak and chaparral vegetation community.	none	NA
BUR1	Site BUR1 is located at the top of Burnt Peak within the Angeles National Forest in association with existing facilities. The site is located within a dense and extensive stand of canyon live oak and chaparral vegetation community.	none	NA
BUR2	Site BUR2 is located at the top of Burnt Peak within the Angeles National Forest in association with existing facilities. The site is located within a dense and extensive stand of canyon live oak and chaparral vegetation community.	none	NA
BUR3	Site BUR3 is located at the top of Burnt Peak within the Angeles National Forest in association with existing facilities. The site is located within a dense and extensive stand of canyon live oak and chaparral vegetation community.	none	NA
CPK	Site CPK is part of an existing communications facility located on a leveled top of Castro Peak within an extensive stand of scrub oak on the north-facing slopes and chaparral on the south-facing slopes. Common species include mountain mahogany, big-berry manzanita, chamise, and laurel sumac.	coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		marcescent dudleya (<i>Dudleya cymosa ssp. marcescens</i>)	ESA-T CA-R CRPR-1B.2

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
		Santa Susana tarplant (<i>Deinandra minthornii</i>)	CA-R CRPR-1B.2
DPK	Site DPK is located on Santa Catalina Island on a ridgeline within a transition of coastal sage scrub and chaparral vegetation communities. The area has been overgrazed, resulting in areas of bare soil. Common shrubs include coast prickly pear, white sage (<i>Salvia apiana</i>), laurel sumac, island buckwheat (<i>Eriogonum crocatum</i>), sagebrush, toyon (<i>Heteromeles arbutifolia</i>), black sage, and lemonadeberry.	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		Santa Catalina shrew (<i>Sorex ornatus willetti</i>)	CDFW-SSC
		aphanisma (<i>Aphanisma blitoides</i>)	CRPR-1B.2
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		chaparral ragwort (<i>Senecio aphanactis</i>)	CRPR-2B.2
		coast woolly-heads (<i>Nemacaulis denudata</i> var. <i>denudata</i>)	CRPR-1B.2
		Coulter's saltbush (<i>Atriplex coulteri</i>)	CRPR-1B.2
		Davidson's saltscale (<i>Atriplex serenana</i> var. <i> davidsonii</i>)	CRPR-1B.2
		island green dudleya (<i>Dudleya virens</i> ssp. <i>insularis</i>)	CRPR-1B.2
		island rush-rose (<i>Crocianthemum greenei</i>)	ESA-T CRPR-1B.2
		Nevin's woolly sunflower (<i>Constancea nevinii</i>)	CRPR-1B.3
		round-leaved filaree	CRPR-1B.1

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		<i>(California macrophylla)</i>	
		Santa Catalina figwort <i>(Scrophularia villosa)</i>	CRPR-1B.2
		Santa Catalina Island bedstraw <i>(Galium catalinense ssp. catalinense)</i>	CRPR-1B.2
		Santa Catalina Island currant <i>(Ribes viburnifolium)</i>	CRPR-1B.2
		Santa Catalina Island desert-thorn <i>(Lycium brevipes var. hasse)</i>	CRPR-1B.1
		Santa Catalina Island ironwood <i>(Lyonothamnus floribundus ssp. floribundus)</i>	CRPR-1B.2
		Santa Catalina Island manzanita <i>(Arctostaphylos catalinae)</i>	CRPR-1B.2
		Santa Catalina Island monkeyflower <i>(Mimulus traskiae)</i>	CRPR-1A
		Santa Cruz Island rockcress <i>(Sibara filifolia)</i>	ESA-E CRPR-1B.1
		showy island snapdragon <i>(Gambelia speciosa)</i>	CRPR-1B.2
		south coast saltscale <i>(Atriplex pacifica)</i>	CRPR-1B.2
		Wallace's nightshade <i>(Solanum wallacei)</i>	CRPR-1B.1
ENC1	Site ENC1 is within a large facility with concrete drives, asphalt and unpaved roads, and buildings. It is generally in a canyon setting with hills to the north and a drainage to the south. The hills and canyon slopes are covered with chamise chaparral and coast live oak woodland vegetation. An intermittent stream within the study area includes broadleaf deciduous riparian trees. Common species include purple sage (<i>Salvia leucophylla</i>), mountain mahogany, scrub oak, chamise, redberry (<i>Rhamnus crocea</i>), coast live oak, and bush buckwheat. The canyon bottoms and drainages have a mixture of natives and	western pond turtle <i>(Emys marmorata)</i>	CDFW-SSC
		monarch butterfly <i>(Danaus plexippus)</i>	ESA-Pet
		marcescent dudleya	ESA-T CA-R

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	ornamentals including alder (<i>Alnus rhombifolia</i>), sycamore (<i>Platanus racemosa</i>), pines, and ash.	<i>Dudleya cymosa</i> ssp. <i>marcescens</i>	CRPR-1B.2
		Santa Monica dudleya (<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>)	ESA-T CRPR-1B.1
		Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	CRPR-2B.2
ENT	Site ENT is located on a ridgetop that has been leveled. Large nonnative eucalyptus and pine trees surround the two water tanks. Steep slopes north and east of the site include coastal sage scrub and chaparral vegetation. Common species include purple sage, laurel sumac, sagebrush, scrub oak, California lilac (<i>Ceanothus</i> sp.), redberry, deerweed (<i>Acmispon glaber</i>) and ornamental pines; scattered residences are in the vicinity. (On August 12, 2014, an abandoned raptor nest was observed in a eucalyptus tree at the Project site.)	American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		western pond turtle (<i>Emys marmorata</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
FRP	Site FRP is located in the Angeles National Forest near the top of Frost Peak in the San Gabriel Mountains. At an elevation of approximately 8,450 feet, the vegetation is primarily white fir and Jeffrey pine forest, with a shrub understory of manzanita (<i>Arctostaphylos</i> sp.), buckwheat (<i>Eriogonum</i> sp.), and sagebrush (<i>Artemisia</i> sp.).	south coast marsh vole (<i>Microtus californicus stephensi</i>)	CDFW-SSC
		mountain yellow-legged frog - Southern California DPS (<i>Rana muscosa</i>)	ESA-E ESA-CH CA-E USFS-Sens
		lemon lily (<i>Lilium parryi</i>)	CRPR-1B.2 USFS-Sens
		San Antonio milk-vetch (<i>Astragalus lentiginosus</i> var. <i>antoniis</i>)	CRPR-1B.3 USFS-Sens
FTP	Site FTP is located on a steep hilltop with chaparral vegetation. Vegetation includes bush buckwheat, and sagebrush dominates the south-facing slopes. Dense oak, toyon, bush monkeyflower, lemonadeberry, and mountain mahogany dominate the north-facing slopes.	American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		least Bell's vireo	ESA-E

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		(<i>Vireo bellii pusillus</i>)	CA-E
		southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	ESA-E ESA-CH CA-E
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		Parish's gooseberry (<i>Ribes divaricatum var. parishii</i>)	CRPR-1A
GMT	Site GMT is located in the Angeles National Forest on Grass Mountain, a hilltop clearing with nonnative grassland and scattered canyon live oak and Coulter pines (<i>Pinus coulteri</i>); downslope are dense stands of chaparral vegetation. Vegetation on the north-facing slope includes Coulter pine, blue elderberry (<i>Sambucus nigra ssp. caerulea</i>), and squawbush (<i>Rhus trilobata</i>), with nonnative grassland on the south-facing slopes.	round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
		San Fernando Valley spineflower (<i>Chorizanthe parryi var. fernandina</i>)	ESA-C CA-E CRPR-1B.1 USFS-Sens
GRM	Site GRM is located on a hilltop in the Santa Monica Mountains with several unpaved roadways leading up the slope and circling the existing facilities at the Project site. The site is located in chaparral with laurel sumac, bush buckwheat, bush monkeyflower, several species of ceanothus, and deerweed.	two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	ESA-E ESA-CH CRPR-1B.1
		white-veined monardella (<i>Monardella hypoleuca ssp. hypoleuca</i>)	CRPR-1B.3
H-17A	Site H-17A is located on a hilltop in the Puente Hills at a former Nike Missile site. Housing developments occur to the west, and undeveloped hillsides and valleys to the east and north. The southwestern portion of the study area contains coastal sage scrub vegetation; the eastern portion contains nonnative grassland, with scattered blue elderberry, and walnut in the draws and north-facing slopes.	bank swallow (<i>Riparia riparia</i>)	CA-T
		burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC
		coastal California gnatcatcher (<i>Polioptila californica californica</i>)	ESA-T ESA-CH CDFW-SSC
		least Bell's vireo	ESA-E

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		<i>(Vireo bellii pusillus)</i>	CA-E
		coast horned lizard <i>(Phrynosoma blainvillii)</i>	CDFW-SSC
		intermediate mariposa-lily <i>(Calochortus weedii var. intermedius)</i>	CRPR-1B.2
		many-stemmed dudleya <i>(Dudleya multicaulis)</i>	CRPR--1B.2
H-69B	Site H-69B is located adjacent to a paved road on a hilltop in the San Gabriel Mountains. The site is used as a helicopter landing pad and has been largely leveled and cleared of vegetation, with patches of chaparral on steep slopes. Dense chaparral shrubs are on steep north-facing slopes within the study area. Vegetation includes chamise, big-berry manzanita, laurel sumac, bush buckwheat, purple sage, and chaparral currant (<i>Ribes malvaceum</i>). A private residence and vineyard is within the study area, and other residences are scattered throughout the vicinity.	American peregrine falcon <i>(Falco peregrinus anatum)</i>	CA-FP
		California mountain kingsnake <i>(Lampropeltis zonata)</i>	CDFW-SSC
		coast horned lizard <i>(Phrynosoma blainvillii)</i>	CDFW-SSC
		two-striped garter snake <i>(Thamnophis hammondi)</i>	CDFW-SSC
		western pond turtle <i>(Emys marmorata)</i>	CDFW-SSC
		monarch butterfly <i>(Danaus plexippus)</i>	ESA-Pet
JOP	Site JOP is located on a mountaintop in the San Gabriel Mountains with sparse chaparral on south-facing slopes and dense canyon live oak forest in the shaded canyons. The bedrock is primarily very old metamorphics, and the vegetation is recovering from a recent burn. The vegetation includes bush buckwheat, Our Lord's candle (<i>Yucca whipplei</i>), poodle plant (<i>Turricula parryi</i>), canyon live oak (<i>Quercus chrysolepis</i>), sulfur buckwheat (<i>Eriogonum umbellatum</i>), bricklebrush (<i>Brickellia californica</i>), ceanothus, blackberry (<i>Rubus ursinus</i>), and prickly phlox (<i>Leptodactylon sp.</i>).	Coast Range newt <i>(Taricha torosa)</i>	CDFW-SSC
		Greata's aster <i>(Symphyotrichum greatae)</i>	CRPR-1B.3
JPK	Site JPK is located on a mountaintop in the San Gabriel Mountains and contains chamise chaparral on the south-facing slopes and oak woodland and forest on the north-facing slopes. Common woody species includes chamise, laurel sumac, coast live oak, toyon, and mountain mahogany.	Coast Range newt <i>(Taricha torosa)</i>	CDFW-SSC
		two-striped garter snake <i>(Thamnophis hammondi)</i>	CDFW-SSC USFS-Sens
		Greata's aster <i>(Symphyotrichum greatae)</i>	CRPR-1B.3

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		many-stemmed dudleya (<i>Dudleya multicaulis</i>)	CRPR-1B.2 USFS-Sens
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
JPK2	Site JPK2 is located on a mountaintop adjacent to JPK-1 in the San Gabriel Mountains and contains chamise chaparral on the south-facing slopes and oak woodland forest on the north-facing slopes.	Coast Range newt (<i>Taricha torosa</i>)	CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC USFS-Sens
		many-stemmed dudleya (<i>Dudleya multicaulis</i>)	CRPR-1B.2 USFS-Sens
		Greata's aster (<i>Symphotrichum greatae</i>)	CRPR-1B.3
		round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1
LACF072	Site LACF072 is located in a suburban/rural setting on a hillside slope in the Santa Monica Mountains adjacent to a paved road in association with a fire station. The Project site is within an existing fenced facility and landscaped with ornamental vegetation including several large nonnative trees; no native habitats are present on site. The study area includes residences and corrals on neighboring properties. The site contains ornamental oaks, catalpa, pine, and deodar cedar trees. Less disturbed areas include chaparral vegetation east of the fenced area on steep slopes with coast live oak woodlands and patches with coastal sage scrub components, including scattered flattop bush buckwheat, laurel sumac, California sagebrush, and mountain mahogany.	western pond turtle (<i>Emys marmorata</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Santa Monica dudleya (<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>)	ESA-T CRPR-1B.1
		Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	CRPR-2B.2
LACFCP08	Site LACFCP08 is located on a broad hilltop in the Santa Monica Mountains, adjacent to a large complex of structures, paved areas, and ornamental vegetation. The surrounding slopes are coastal sage scrub/chaparral vegetation community. Some native vegetation is present within the Project site. The vegetation is too dense and the slopes too steep and rocky to walk. The site is located on cut-and-fill slopes with mostly weedy annuals. The south-facing slopes contain coastal sage scrub, and the north facing slopes contain chaparral. The dominant native shrubs are chamise, bush buckwheat, redberry, deerweed, and laurel sumac.	American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
LACFCP09	Site LACFCP09 is located on a mountain ridge in the San Gabriel Mountains, with montane chaparral on the south-facing slopes and big-cone Douglas-fir (<i>Pseudotsuga menziesii</i>) and yellow pine forest on the	Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	CRPR-1B.2

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	north-facing slopes. The site is long and narrow, as dictated by the topography. The slopes are too steep to survey. A stand of Coulter pines have been planted on the east side.		
LACFCP11	Site LACFCP11 is at a Los Angeles County detention center in association with an existing water tank and helipad located at the end of a ridgeline, above and adjacent to Soledad Canyon Road. The Santa Clara River is on the opposite side of Soledad Canyon Road. Maher Canyon, an ephemeral drainage, passes through the detention facility, crosses under Soledad Canyon Road, and joins the Santa Clara River. Primary vegetation within the study area is chamise chaparral; within the Maher Canyon drainage and Santa Clara River corridor on the opposite side of Soledad Canyon Road is mature riparian forest that includes coast live oak and California sycamore trees. The main facility is located in a wide side canyon with some buildings at the base of the slope and the helipad on a ridge adjacent to Soledad Canyon Road. Vegetation includes coast live oak, bush buckwheat, chamise, coastal sagebrush, buckbrush (<i>Ceanothus greggii</i>), and arroyo willow (<i>Salix lasiolepis</i>).	coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		Santa Ana sucker (<i>Catostomus santaanae</i>)	ESA-T CDFW-SSC
		unarmored threespine stickleback (<i>Gasterosteus aculeatus williamsoni</i>)	ESA-E CA-E
LARICSHQ	Site LARICSHQ is located in the city of Monterrey Park. The site is landscaped and made up of buildings asphalt and parking lots.	American badger (<i>Taxidea taxus</i>)	CDFW-SSC
		bank swallow (<i>Riparia riparia</i>)	CA-T
		burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC
		southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	ESA-E ESA-CH CA-E
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
LEPS	Site LEPS is located in the Santa Monica Mountains in association with an existing water tank in a fenced and paved compound that has been cut back into the hillside, resulting in an excavated disturbance zone of approximately 100 feet surrounding the water tank. Although coastal sage scrub vegetation is reestablishing in the disturbance zone, it appears the area is mowed as part of site maintenance. A few California walnut trees are adjacent to the Project site. The surrounding vegetation within the study area is coastal sage scrub dominated by California sagebrush, purple sage, and California buckwheat; on the opposite side of the paved Encinal Canyon Road is a shallow canyon with ephemeral drainage that supports riparian vegetation including California sycamore, coast live oak, and arroyo willow.	essential fish habitat	MSA
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Santa Susana tarplant (<i>Deinandra minthornii</i>)	CA-R CRPR-1B.2
		Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	CRPR-2B.2
LPC	Site LPC is located on a mountain ridge at 4,025 feet elevation in the San Gabriel Mountains within	Davidson's bush-mallow	CRPR-1B.2

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	montane chaparral vegetation. Diagnostic woody vegetation includes interior live oak (<i>Quercus wislizenii</i>), squaw bush, mountain mahogany, deerweed, manzanita, chamise, and laurel sumac.	(<i>Malacothamnus davidsonii</i>)	
MMC	Site MMC is located on a mountaintop in the San Gabriel Mountains. The vegetation had recently burned, and the study area contains mostly cheatgrass. The study area was probably dominated by scrub oak in the past. Seedlings of bush buckwheat, rubber rabbitbrush (<i>Chrysothamnus nauseosus</i>), ceanothus, poodle plant, and scrub oak were observed.	coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC NA
MML	Site MML is located on the top of Magic Mountain in the San Gabriel Mountains. The vegetation consists of chamise chaparral.	none	NA
MTL2	Site MTL2 is located along a ridgeline in the San Gabriel Mountains. The site contains chamise chaparral on north-facing slopes and buckwheat on the south-facing slopes.	coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	CRPR-1B.2
OAT	Site OAT is one of a series of hilltop communications facilities along the Oat Mountain ridgeline in the Santa Susana Mountains. Valley Oak Woodland occurs in close proximity in the study area. Numerous oil extraction wells and facilities are within 0.5 to 1 mile of the site, with many roads curving along ridgelines. Due to these operations, vegetation is limited on the south side of the Oak Mountain ridgeline (oak forests are on north exposures).	western mastiff bat (<i>Eumops perotis californicus</i>)	CDFW-SSC
		California Orcutt grass (<i>Orcuttia californica</i>)	ESA-E CA-E CRPR-1B.1
		slender-horned spineflower (<i>Dodecahema leptoceras</i>)	ESA-E CA-E CRPR-1B.1
PASDP01	Site PASDP01 is totally urbanized and located in downtown Pasadena. The study area does not contain native vegetation. The structures in the vicinity are very large and old structures. Vegetation is primarily limited to large expanses of lawn with very few trees or shrubs.	pallid bat (<i>Antrozous pallidus</i>)	CDFW-SSC
		western mastiff bat (<i>Eumops perotis californicus</i>)	CDFW-SSC
		American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		bank swallow (<i>Riparia riparia</i>)	CA-T
		burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC
		least Bell's vireo (<i>Vireo bellii pusillus</i>)	ESA-E CA-E

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	ESA-E ESA-CH CA-E
		Coulter's goldfields (<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>)	CRPR-1B.1
		mesa horkelia (<i>Horkelia cuneata</i> var. <i>puberula</i>)	CRPR-1B.1
		Parish's gooseberry (<i>Ribes divaricatum</i> var. <i>parishii</i>)	CRPR-1A
		white rabbit-tobacco (<i>Pseudognaphalium leucocephalum</i>)	CRPR-2B.2
PDC	Site PDC is located at the base of the east side of the Hollywood Hills entirely within an urban setting containing buildings, roads, paved parking areas, and landscaped areas. The Pacific Design Center is a complex of extremely large buildings surrounded by walkways, lawn, and ornamental trees. The site contains a multistory parking structure. The antennas would be placed on the roof on one of the buildings.	monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	ESA-E ESA-CH CRPR-1B.1
PHN	Site PHN is located in the Puente Hills on a hilltop with existing communication towers and associated facilities; the compound is paved and fenced. The immediate area adjacent to the compound is either mowed or treated with herbicide. The study area is primarily nonnative grassland with small patches of coastal sage scrub vegetation on steep slopes to the south; California black walnut woodland and coast live oak are found on slopes and in drainage channels as close as about 150 feet north and below the existing facility.	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	ESA-T ESA-CH CDFW-SSC
PMT	Site PMT is located on a remote mountaintop in the eastern San Gabriel Mountains on Pine Mountain. The study area is within the montane chaparral vegetation community. Diagnostic woody species include bush buckwheat, manzanita, silk tassel bush (<i>Garrya</i> sp.), chaparral whitethorn (<i>Ceanothus leucodermis</i>), redberry, scrub oak (<i>Quercus</i> sp.), big-cone Douglas fir, holly-leaf cherry, and interior live oak. Mesic canyons contain big-leaf maple (<i>Acer macrophyllum</i>).	Rock Creek broomrape (<i>Orobanche valida</i> ssp. <i>valida</i>)	CRPR-1B.2 USFS-Sens
PWT	Site PWT is located on a hillside slope within a cut-slope constructed for the installation of the water tank. The ground surrounding the tank has revegetated with both native and nonnative species, but the perimeter extending up to about 100 feet from the tank is regularly mowed. The Project site is surrounded by fairly extensive stands of coastal sage scrub vegetation with evidence of past fires. The	monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	undisturbed vegetation is dominated by dune buckwheat (<i>Eriogonum parviflorum</i>), toyon, laurel sumac, coyote brush (<i>Baccharis pilularis</i>), encelia (<i>Encelia californica</i>), purple sage, and lemonadeberry.		
RIH	Site RIH is located on an isolated hill between the Puente Hills landfill and Rose Hills Memorial Park. The study area includes native and restored coastal sage scrub vegetation. Native woody vegetation includes encelia, black sage, laurel sumac, bush buckwheat, coyote brush, elderberry (<i>Sambucus nigra</i>), and toyon.	San Diego woodrat (<i>Neotoma lepida intermedia</i>)	CDFW-SSC
		bank swallow (<i>Riparia riparia</i>)	CA-T
		coastal California gnatcatcher (<i>Polioptila californica californica</i>)	ESA-T ESA-CH CDFW-SSC
		least Bell's vireo (<i>Vireo bellii pusillus</i>)	ESA-E CA-E
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		intermediate mariposa-lily (<i>Calochortus weedii var. intermedius</i>)	CRPR-1B.2
		many-stemmed dudleya (<i>Dudleya multicaulis</i>)	CRPR-1B.2
SDW	Site SDW is within the city of San Dimas and is located on a ridgeline overlooking Walnut Creek and adjacent to the I-10/I-215 interchange. The Project site is situated at approximately 1,227 feet elevation. The site is fenced and has an asphalt driveway and cleared compacted soils. The site is surrounded on three sides by upscale housing developments. The downslope is part of the watershed for Walnut Creek, which is dry most of the year at this location. Scattered vegetation on the site includes native narrow-leaf milkweed (<i>Asclepias fascicularis</i>) and common weeds such as wild oats (<i>Avena sp.</i>), red-stemmed filaree, coyote melon, biennial mustard, horehound, and telegraph weed (<i>Heterotheca grandiflora</i>). A row of California pepper trees (<i>Schinus molle</i>) stands adjacent to an existing water tank on the site. The study area consists primarily of residential or other developed lands, in ruderal condition or planted with ornamental vegetation. The canyon and drainage to the south of the Project site are the headwaters of Walnut Creek. The area has been impacted by development and past fires and is primarily composed of nonnative grasslands dominated by wild oats and brome grasses (<i>Bromus spp.</i>) with California black walnut trees in the drainage bottoms and scattered shrubs including Mexican elderberry and coast prickly pear. A few steep slopes and road cuts include scattered, small patches of remnant coastal sage	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	ESA-T ESA-CH CDFW-SSC
		many-stemmed dudleya (<i>Dudleya multicaulis</i>)	CRPR-1B.2

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	scrub vegetation composed largely of coast prickly pear but also including sparse California sagebrush on the steepest slopes. A dense patch of coast prickly pear with elderberry (<i>Opuntia littoralis</i> -mixed coastal sage scrub community) is immediately downslope of the Project site. The bottom of the canyon includes the headwaters of Walnut Creek. The canyon floor and adjacent side canyons contain walnut woodland.		
SGH	Site SGH is located on a broad hilltop surrounded by residential and commercial development with mature landscaping, paved roads, and a small urban park and oil well pumps in the general vicinity. No natural vegetation or habitats are present in the study area.	none	NA
SIM	Site SIM is located in an urban setting at Universal Studios. Landscape vegetation in the area includes ornamental trees and shrubs, with interspersed native California black walnut trees and toyon. Adjacent to the study area a seven-story building is under construction. The site lacks native vegetation, and the dense vegetation on the north-facing slopes of the road cuts are ornamentals.	pallid bat (<i>Antrozous pallidus</i>)	CDFW-SSC
		western pond turtle (<i>Emys marmorata</i>)	CDFW-SSC
		mesa horkelia (<i>Horkelia cuneata</i> var. <i>puberula</i>)	CRPR-1B.1
		Parish's brittlescale (<i>Atriplex parishii</i>)	CRPR-1B.1
SPN	Site SPN is located within an existing complex of communication facilities on Saddle Peak, high in the Santa Monica Mountains. The study area is within the montane chaparral vegetation community. The north-facing slopes contain mountain mahogany, chamise, scrub oak, toyon, and manzanita. The south-facing slopes contain laurel sumac, and bush buckwheat.	American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		California mountain kingsnake (<i>Lampropeltis zonata</i>)	CDFW-SSC
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
SUN	Site SUN is located along a high ridgeline in the San Gabriel Mountains on Sunset Ridge. The vegetation is dominated by scrub oak chaparral and is recovering from a fire. Common species includes planted Coulter pines.	Greata's aster (<i>Symphotrichum greatae</i>)	CRPR-1B.3
		Hall's monardella (<i>Monardella macrantha</i> ssp. <i>hallii</i>)	CRPR-1B.3 USFS-Sens
SUN2	Site SUN2 is located along a high ridgeline in the San Gabriel Mountains adjacent to SUN. The vegetation is dominated by scrub oak and is recovering from a fire.	Greata's aster (<i>Symphotrichum greatae</i>)	CRPR-1B.3

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Hall's monardella (<i>Monardella macrantha</i> ssp. <i>hallii</i>)	CRPR-1B.3 USFS-Sens
TMT	Site TMT is located near the top of Table Mountain in the eastern San Gabriel Mountains, at an elevation of approximately 7,500 feet. The vegetation is Jeffrey pine forest with an understory of Wright's buckwheat (<i>Eriogonum wrightii</i>), Great Basin sagebrush (<i>Artemisia tridentata</i>), sticky-leaf goldenbush (<i>Chrysothamnus viscidiflorus</i>), snowberry (<i>Symphoricarpos</i> sp.), sulfur buckwheat, false tarragon (<i>Artemisia dracunculus</i>), and horsebrush (<i>Tetradymia canescens</i>).	pallid San Diego pocket mouse (<i>Chaetodipus fallax pallidus</i>)	CDFW-SSC
		south coast marsh vole (<i>Microtus californicus stephensi</i>)	CDFW-SSC
		San Gabriel Mountains blue butterfly (<i>Plebejus saepiolus aureolus</i>)	USFS-Sens
		Big Bear Valley woollypod (<i>Astragalus leucolobus</i>)	CRPR-1B.2
		grey-leaved violet (<i>Viola pinetorum</i> var. <i>grisea</i>)	CRPR-1B.3
		San Antonio milk-vetch (<i>Astragalus lentiginosus</i> var. <i>antonius</i>)	CRPR-1B.3 USFS-Sens
TOP	Site TOP is located on a hilltop along a ridgeline in the Santa Monica Mountains on Topanga Peak. The site contains dense chamise chaparral. Woody species dominating the vegetation are bush buckwheat, deerweed, bush monkeyflower, laurel sumac, scrub oak, and toyon.	American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP
		California mountain kingsnake (<i>Lampropeltis zonata</i>)	CDFW-SSC
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		two-striped garter snake (<i>Thamnophis hammondi</i>)	CDFW-SSC
		western pond turtle (<i>Emys marmorata</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	ESA-E ESA-CH CA-E

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
			CRPR-1B.1
TPK	Site TPK is located on a broad mountain top on Tejon Peak. Woody vegetation is dominated by canyon live oak in the canyons but mostly nonnative grassland dominated by cheatgrass (<i>Bromus tectorum</i>) and red brome (<i>B. rubens</i>) with canyon live oak in the draws and canyons outside of the study area.	Tehachapi pocket mouse (<i>Perognathus alticolus inexpectatus</i>)	CDFW-SSC USFS-Sens
		coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		yellow-blotched salamander (<i>Ensatina eschscholtzii croceator</i>)	CDFW-SSC USFS-Sens
TWR	Site TWR is located on a hilltop of Tower Peak along a steep ridge in highly disturbed coastal sage scrub vegetation. Island oak trees are on north-facing slopes and into broad canyons below the Project site. Coastal sage scrub on the dryer habitats is dominated by coast prickly pear, coastal sagebrush, and toyon.	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T
		essential fish habitat	MSA
		beach spectaclepod (<i>Dithyrea maritima</i>)	CA-T CRPR-1B.1
		California dissanthelium (<i>Dissanthelium californicum</i>)	CRPR-1B.2
		Catalina crossosoma (<i>Crossosoma californicum</i>)	CRPR-1B.2
		Catalina Island dudleya (<i>Dudleya virens ssp. hassei</i>)	CRPR-1B.2
		Coulter's saltbush (<i>Atriplex coulteri</i>)	CRPR-1B.2
		decumbent goldenbush (<i>Isocoma menziesii var. decumbens</i>)	CRPR-1B.2
		Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	ESA-E ESA-CH CA-E CRPR-1B.1
		Nevin's woolly sunflower (<i>Constancea nevinii</i>)	CRPR-1B.3
round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1		

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
		Santa Catalina figwort (<i>Scrophularia villosa</i>)	CRPR-1B.2
		Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	CRPR-1B.2
		Santa Catalina Island currant (<i>Ribes viburnifolium</i>)	CRPR-1B.2
		Santa Catalina Island ironwood (<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>)	CRPR-1B.2
		showy island snapdragon (<i>Gambelia speciosa</i>)	CRPR-1B.2
		Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)	CRPR-1B.2
VPK	Site VPK is located on a hilltop at the Verdugo Peak county communications facility in chaparral vegetation surrounded by steep slopes. The vegetation is too dense to conduct a thorough botanical survey. Dominant chaparral species included chamise, black sage, scrub oak, bush buckwheat, laurel sumac, and toyon.	Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	CRPR-1B.2
WAD	Site WAD is located in the Hollywood Hills at an existing water tank/antenna location in a completely urbanized area that lacks native habitat for sensitive species. A steep cliff on one side of the Project site has been cemented at the lower portion to reduce erosion. Vegetation includes laurel sumac and Our Lord's candle.	coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
		Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	ESA-E ESA-CH CRPR-1B.1
WMP	Site WMP is located on a high peak along a ridgeline in the San Gabriel Mountains at Whittaker Ridge. Slopes are steep, and the vegetation is primarily recently burned chamise chaparral. Diagnostic woody shrubs include chamise, manzanita, bush buckwheat, and bush poppy (<i>Dendromecon rigida</i>).	California red-legged frog (<i>Rana draytonii</i>)	ESA-T ESA-CH CDFW-SSC
WS1	Site WS1 is located in a completely urbanized area and does not contain native vegetation or natural habitats. Coastal beaches, intensively used by recreationists, are within 0.1 mile on the opposite side of the Pacific Coast Highway. Proposed construction is on the roof of a high-rise building separated from	western mastiff bat (<i>Eumops perotis californicus</i>)	CDFW-SSC
		bank swallow	CA-T

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
	coastal beaches by cliffs and Pacific Coast Highway. Landscape vegetation occurs within the study area between Ocean Avenue and the Pacific Coast Highway.	<i>(Riparia riparia)</i>	
		least Bell's vireo <i>(Vireo bellii pusillus)</i>	ESA-E CA-E
		Swainson's hawk <i>(Buteo swainsoni)</i>	CA-T
		two-striped garter snake <i>(Thamnophis hammondi)</i>	CDFW-SSC
		essential fish habitat	MSA
		monarch butterfly <i>(Danaus plexippus)</i>	ESA-Pet
		beach spectaclepod <i>(Dithyrea maritima)</i>	CA-T CRPR-1B.1
		coastal dunes milk-vetch <i>(Astragalus tener var. titi)</i>	ESA-E CA-E CRPR-1B.1
		Parish's brittlescale <i>(Atriplex parishii)</i>	CRPR-1B.1
		salt marsh bird's-beak <i>(Chloropyron maritimum ssp. maritimum)</i>	ESA-E CA-E CRPR-1B.2
		Salt Spring checkerbloom <i>(Sidalcea neomexicana)</i>	CRPR-2B.2
		southern tarplant <i>(Centromadia parryi ssp. australis)</i>	CRPR-1B.1
		Ventura Marsh milk-vetch <i>(Astragalus pycnostachyus var. lanosissimus)</i>	ESA-E CA-E CRPR-1B.1
WTR	Site WTR is located at a high point along Whitaker Ridge in the Santa Monica Mountains. The site contains chamise chaparral on the north-facing slopes and coastal sage scrub on the south-facing slopes. Diagnostic woody species includes mountain mahogany, scrub oak, redberry, silk tassel bush, big-berry manzanita, ceanothus, and bush poppy. The north slope had recently burned.	slender mariposa-lily <i>(Calochortus clavatus var. gracilis)</i>	CRPR-1B.2

Table 3.3-3: Special Status Plant and Animal Species Recorded within One Mile of Proposed Project Sites¹

Site	Study Area Description	Species Recorded Within One Mile ²	Status Designations ³
ZHQ	Site ZHQ is located at the Zuma Beach lifeguard station with a paved parking lot between the Pacific Coast Highway and the beach, heavily used by recreationists. All natural sand dunes have been bladed flat or piled. Some native coastal strand species have been planted adjacent to existing structures. Coastal strand and dune annuals are sprouting as volunteers in the garden adjacent to the buildings. Species observed included European searocket (<i>Cakile maritima</i>), California croton (<i>Croton californicus</i>), heliotropium (<i>Heliotropium</i> sp.), and pickleweed iceplant (<i>Carpobrotus edulis</i>).	western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	ESA-T ESA-CH CDFW-SSC
		essential fish habitat	MSA
		monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet
<p>¹ This list is not inclusive of all species considered for each proposed Project site, since not all special species are tracked by the CNDDDB, and some species are more wide-ranging and greater distances need to be considered.</p> <p>² Source: CNDDDB queries on March 17, 2014, March 4, 2015, and October 1, 2015.</p> <p>³ ESA-Endangered Species Act; CA-California; E-Endangered; T-Threatened; C-Candidate; Pet-Petitioned; PT-Proposed Threatened; CH-Critical Habitat; BGEPA-Bald and Golden Eagle Protection Act; USFS-Sens-United States Forest Service Sensitive; MSA-Magnuson-Stevens Fishery Conservation and Management Act; R-Rare under the California Native Plant Protection Act; FP-Fully Protected; CDFW-California Department of Fish and Wildlife; SSC-Species of Special Concern; CRPR-California Rare Plant Ranks; 1A-Plants presumed extirpated in California and either rare or extinct elsewhere; 1B- Plants Rare or Endangered in California and elsewhere; 2B- Plants Rare, Threatened, or Endangered in California, but more common elsewhere; NA-Not Applicable.</p> <p>⁴ Golden eagle records within 10 miles of proposed Project sites were considered for this table.</p>			

3.3.1.3 Sensitive Habitats

Sensitive Communities

Sensitive or special status natural communities are vegetation communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. The most current version of the CDFW List of California Terrestrial Natural Communities (http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_list.asp) indicates which natural communities are considered special status. Occurrences of these special status communities are tracked by the CNDDDB. The CNDDDB follows an old state system often referred to as the Holland System that does not correspond directly to the nationwide system used in the current preferred reference of *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009). Table 3.3-4 provides a list of proposed Project sites located within approximately 1 mile of sensitive communities as designated using the Holland system and recorded in the CNDDDB. The descriptions of all plant communities/ associations/ alliances within each study area were converted to the new system; therefore, there are no gaps in identification of sensitive communities due to nomenclature changes within the vegetation classification system.

Table 3.3-4: Sensitive Plant Communities Located within One Mile of Proposed Project Sites

Sensitive Community	Project Sites
California Walnut Woodland	AJT, ENT, OAT, PHN, SIM
Canyon Live Oak Ravine Forest	FRP, PMT, SUN, SUN2
Southern Coast Live Oak Riparian Forest	ENC1, FRP, JPK, JPK2, LACF072, LACFCP09, LPC, MTL2, VPK, WTR
Southern Cottonwood Willow Riparian Forest	LACFCP11, OAT
Southern Mixed Riparian Forest	OAT
Southern Riparian Scrub	LACFCP11
Southern Sycamore Alder Riparian Woodland	BUR, BUR1, BUR2, BUR3, FTP, GMT, GRM, H-68B, JOP, JPK, JPK2, LACFCP11, MTL2, PMT, SUN, SUN2, VPK, WMP, WTR
Southern Willow Scrub	BUR, BUR1, BUR2, BUR3, WMP
Valley Oak Woodland	OAT, WTR
Wildflower Field	TPK

In general, sensitive habitats listed in the CNDDDB focus on vernal pools and riparian woodland/forest. Some woodland habitats are also considered sensitive communities. The southern California black walnut occurs in Los Angeles County as solid stands or mixed most commonly with live oaks. It is affected by overgrazing and the increase in drought conditions. These conditions also result in less seedling survival. The black walnut community is important as wildlife habitat, with the nuts being eaten by squirrels and the tree utilized by many species of birds. Its range is limited to the Santa Clarita River drainage in the vicinity of Sulphur Mountain; small stands in the Simi Hills and Santa Susana Mountains; the north slope of the Santa Monica Mountains; and the San Jose, Puente, and Chino hills. This community is threatened by loss of habitat due to urbanization and its localized range.

North-facing slopes with canyons often contain woodland or riparian forest. The tree canopy at upper elevations is made up of canyon live oak (*Quercus chrysolepis*), a major component of the Southern Canyon Live Oak Riparian Forest. At lower elevations where the canyons open up to a sandy/gravelly wash, the vegetation is dominated by sycamore (*Platanus racemosa*) and white alder (*Alnus rhombifolia*) that comprise the Southern Sycamore-Alder Riparian Woodland.

On north-facing slopes of hillsides the dominant tree in the foothills of the Central Valley is the valley oak. The Valley Oak Woodland has an understory of chaparral species and nonnative grasses, primarily wild oats (*Avena* sp.). At lower elevations on inland mountains and coastal hills the canyons and north-facing slopes are dominated by coast live oak. This species may occur as a woodland (Southern Live Oak Woodland) or riparian forest (Southern Coast Live Oak Riparian Forest) in the canyons with permanent or ephemeral streams. These two communities were common at one time but have become rare due to the limited acreage of the linear habitat and the level of urbanization in Los Angeles County.

The most common tree species on the desert floor, especially at springs, washes, and rivers, is the Fremont cottonwood (*Populus fremontii*). It is the visually dominant species of the Southern Cottonwood Riparian Woodland. This tree occurs primarily in Los Angeles County on the desert foothills of the San Gabriel Mountains. Although this tree is widespread, wash habitat makes up a small portion of the desert. This tree is important nesting habitat for many species of migratory birds.

The wildflower fields plant community is not dominated by trees or shrubs but is composed of annual grasses and forbs. Grasslands and wetlands are the most disturbed habitats in North America. This community is dominated by nonnative grasslands when rainfall is early and by wildflowers when rains fall after February. The makeup of this community is affected by the frequency of fires and intensity of grazing by large mammals. This community has also been affected by the introduction of nonnative annuals that are better adapted to the increased disturbance. This community is best known by the showy state flower, the California poppy (*Eschscholzia californica*), which is greatly reduced in numbers over the last 100 years. In the spring, large patches of blue lupines and chia, yellow and white flowering composites, and a few perennial species form this community. Today the most common species are nonnative annual grasses (e.g., *Bromus*, *Hordeum*, and *Avena*) and red-stemmed filaree.

Critical Habitat and Essential Fish Habitat

Other sensitive habitats include critical habitat designated by USFWS under the authority of the ESA for threatened or endangered species and essential fish habitat designated by NMFS under the authority of the Magnuson-Stevens Fishery Conservation and Management Act (Section 3.3.2.1). Essential Fish Habitat includes all types of habitat where fish spawn, breed, feed, or grow to maturity and is identified for federally managed species. The term Essential Fish Habitat (EFH) is used as an overarching category. Within the study areas, three subcategories, or guilds of marine life, were identified: West coast highly migratory species (e.g., tuna, shark, swordfish), coastal pelagic species (e.g., krill, finfish, market squid), and Pacific coast groundfish (e.g., rockfish, flatfish, groundfish, sharks). The subcategories include just a

few to almost 100 different species and were therefore not identified individually. Table 3.3-5 lists those proposed Project sites within 1 mile of these sensitive habitats.

Table 3.3-5: Designated Critical Habitat and Essential Fish Habitat within One Mile of Proposed Project Sites

Critical Habitat/Essential Fish Habitat	Project Sites
arroyo toad	LACFCP11
Braunton's milk-vetch	GRM, PWT
California condor	TPK, WMP
California red-legged frog	WMP
coastal California gnatcatcher	H-17A, OAT, PHN, RIH, SDW
essential fish habitat	LEPS, TWR, ZHQ
Santa Ana sucker	MTL2
mountain yellow-legged frog- Southern California DPS	FRP
tidewater goby	ZHQ
western snowy plover	WS1, ZHQ

Critical habitat is a term defined and used in the federal ESA. It describes specific geographic areas essential to the conservation of an endangered or threatened species and that may require special management and protection. Critical habitat may also include areas that are not currently occupied by the species but will be needed for its recovery. Primary constituent elements are those physical and biological features of a landscape that a species needs to survive and reproduce. Only areas that contain the primary constituent elements required by the species are considered critical habitat.

These include:

- Space for individual and population growth and for normal behavior
- Cover or shelter
- Food, water, air, light, minerals, or other nutritional or physiological requirements
- Sites for breeding and rearing offspring
- Habitats that are protected from disturbances or are representative of the historical geographical and ecological distributions of a species

Federal agencies are required to consult with USFWS on actions they carry out, fund, or authorize to ensure that their actions will not destroy or adversely modify critical habitat.

3.3.1.4 Protected Wetlands

Wetlands are protected by federal and state statute (see Section 3.3.2). Protection under these regulations provides for specific permitting if direct or indirect impacts would occur to regulated wetlands. Various types of wetlands occur within the study areas. No wetlands occur within the

boundary of any proposed Project site. Table 3.3-6 identifies the types of wetlands recorded within each of the study areas.

Table 3.3-6: Type of Wetlands Located within Proposed Project Study Areas

Wetland Type	Proposed Project Site Study Area(s)
Freshwater/Forested Shrub Ephemeral and Riverine Ephemeral	AJT, ENC1, GRM, H-17A, JPK, JPK2, LACFCP09, LEPS, LPC, PHN
Riverine Concrete-lined Channel	ASD
Riverine Ephemeral	CPK, LACF072, LACFCP08, LACFCP11, PMT, PWT, SUN, SUN2, TOP, VPK
Freshwater/Forested Shrub Ephemeral	H-69B, OAT, SDW
Estuarine and Deep Water Marine	WS1
Freshwater Pond Ephemeral	SIM
Freshwater Forested/Shrub Wetland and Estuary and Marine	ZHQ

3.3.1.5 Wildlife Corridors and Nurseries

No wildlife nurseries or colonial breeding sites were identified or recorded in the vicinity of any proposed Project site. Wildlife movement corridors/habitat linkage areas have been designated under the authorities of local government, and are identified in Section 3.3.2.3. Those Project sites that are within 1 mile of a designated wildlife movement corridor are identified in Section 3.3.4.

3.3.1.6 Local Biological Resources Policies and Ordinances

Local policies and ordinances that contain protection measures for biological resources are described in this section. Those proposed Project sites that are within the area of jurisdiction for each plan are identified on a plan-by-plan basis.

Federal land management plans, state parks, local coastal plans, and Los Angeles County include protection of at least some biological resources within their general plans and policies, as do many local ordinances. Protection of native habitats may occur under various designations and may not be the primary intent of a particular ordinance or policy (e.g., dust control, protection of viewshed, hillside erosion management) but results in restricting impacts to native vegetation, wildlife, and wildlife habitats.

Angeles National Forest Land Management Plan- Sites BUR, BUR1, BUR 2, BUR3, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, SUN, SUN2, TMT, WMP, and WTR

Sites located in the Angeles National Forest are under the administration of the U.S.D.A. Forest Service and subject to the Land Management Plan (LMP) for the Angeles National Forest (USDA 2006). A portion of the forest is now also being managed as the San Gabriel Mountains National Monument^[1] under the same plan. The Strategic Goals of the LMP identify goals applicable to biological resources that have potential applicability to proposed Project sites on the Angeles. These include:

^[1] San Gabriel Mountains National Monument was created by proclamation of President Obama on October 10, 2014.

- Goal: 2.1 – Reverse the trend of increasing loss of natural resource values due to invasive species.
- Goal 6.2 – Provide ecological conditions to sustain viable populations of native and desired nonnative species.

Santa Monica Mountains National Recreation Area General Management Plan – Sites LACFCP08 and PWT

The National Park Service finalized the SMNRA General Management Plan and EIS in 2002. Resource management goals in the SMMNRA GMP include protecting and enhancing species, habitat diversity and natural processes, and eradicating alien plant species.

Topanga State Park General Plan – Site GRM

Site GRM lies in Topanga State Park and would be subject to the Topanga State Park General Plan (California State Parks [CSP] 2012), which contains goals and guidelines for the management of natural resources within the park. These include specific guidelines to protect resources under the following topics: native plant communities and sensitive plant species, exotic plant control, wildlife, sensitive wildlife species, exotic animal control, and biocorridors. Specific guidelines applicable to biological resources are discussed below.

Native Plant Communities

- Goal: Promote and restore the sustainability of natural ecosystem processes by actively managing plant community health and development, while maintaining the protection of cultural resources. Efforts also will address the conservation of sensitive and unique species and the control of exotic invasive species
- Guidelines:
 - None identified that would be applicable to the proposed project

Sensitive Plant Species

- Goal: Perpetuate wildlife assemblages by protecting, restoring, and interpreting the native plant communities within the Park
- Guidelines:
 - Protect sensitive plant species, including those that are legally listed under federal and state laws as rare, threatened, or endangered or that are considered rare by the CDFG (now CDFW). In addition, CSP will protect those species that meet the legal requirements for listing but are not listed (i.e., California Native Plant Society List 1B taxa and the federal candidates for listing), and those considered locally sensitive or endemic to the area. Protection may include, but is not limited to, habitat preservation, seed banking, restoration/enhancement, and visitor education

- Avoid or minimize human activities that cause imbalances in the natural ecological system. Additionally, CSP shall conduct management activities, such as habitat restoration, that foster ecological balance

Exotic Plant Control

- Goal: Reduce the presence and further invasion of exotic species in the Park
- Guidelines:
 - None identified that would be applicable to the proposed Project

Wildlife

- Goal: Perpetuate wildlife assemblages by protecting, restoring, and interpreting the native terrestrial and aquatic animals within the Park
- Guidelines:
 - Avoid or minimize human activities that cause imbalances in natural ecological dynamics. Additionally, CSP will conduct management activities, such as habitat restoration, that foster ecological balance.
 - Ensure that the conservation of native wildlife is incorporated into all future developments, management plans, and visitor-use patterns throughout the Park and that the protection of sensitive species and habitats receives high urgency

Sensitive Wildlife Species

- Goal: Protect all sensitive wildlife species occurring in the Park including those legally listed under federal and state law as threatened or endangered, those that are Species of Concern (CDFG), and those considered locally sensitive or endemic to the area
- Guidelines:
 - Preserve sensitive species and habitats to encourage their recovery. Comply with state and federal environmental legislation, Recovery Plans, and Critical Habitat designations enacted to protect this disappearing biota

Exotic Animal Control

- Goal: Work to control exotic animals that are found to upset natural ecological dynamics of native species
- Guidelines:
 - None identified that would be applicable to the proposed project

Santa Catalina Island Local Coastal Plan – Sites BJM, DPK, and TWR

Sites BJM, DPK, and TWR are located on Santa Catalina Island. Biological resources on Santa Catalina Island are protected through the Santa Catalina Island Local Coastal Plan (LACDRP 1983). Under the Local Coastal Plan, biological resources in areas that have been designated as environmentally sensitive habitat areas (ESHAs) are afforded protection. These ESHAs, as identified in the Local Coastal Plan, are located in tidal areas, marine waters, and areas containing rare plants. The Local Coastal Plan also affords ESHA-level protection to lands that are privately owned. Sites BJM, DPK, and TWR are owned by the Santa Catalina Islands Conservancy, a private non-profit entity, and therefore the ESHA-level protection afforded in the Local Coastal Plan is considered applicable to these sites. Underpinning the policies of the Santa Catalina Island Local Coastal Plan, California PRC Section 30240 stipulates that ESHAs be protected against any significant disruption of habitat values, and that only uses dependent on those resources shall be allowed within ESHAs, and that development in areas adjacent to ESHAs shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas.

Policies protecting biological resources within the Santa Catalina Island Local Coastal Plan include those described below. Some of the policies have been abridged to focus on relevant portions of these policies:

- Policy 3: No further introductions of any nonnative animal including fish, reptiles, amphibians, birds, and mammal should be made to any part of Santa Catalina Island.
- Policy 11: Establish grading and other construction site procedures designed to minimize erosion.
- Policy 20: Control the most threatening nonnative weeds by manual removal and topical application of weed killers on a localized level.

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Program - Sites CPK, ENC1, H-69B, LACF072, SPN, and TOP

Sites CPK, ENC1, H-69B, LACF072, SPN, and TOP would be subject to the Santa Monica Mountains LCP Land Use Plan (LACDRP 2014b) and Local Implementation Program (LIP) (LACDRP 2014c). Map 2, Biological Resources of the land use plan, identifies at a landscape level Significant Ecological Resource Areas (SERAs) where development is either prohibited or strictly regulated. Policies contained within Goal CO-2 of the plan offer protection of SERAs as a priority over other development standards in the LIP. SERAs are subdivided into two Habitats: H1 Habitat (containing the highest biological significance, rarity, and sensitivity), H2 Habitat (less sensitive). H3 Habitat consists of disturbed or isolated habitat areas that provide some important biological functions, but do not rise to a level of a SERA. A subcategory of H2 habitat is H2 “High Scrutiny” habitat. H2 High Scrutiny habitat contains more sensitive resources and given greater protection than H2 Habitat. Environmental review policies which provide protection to areas within 200 feet of H1 Habitat are also included in the LCP land use plan.

Not included in SERAs but identified on Map 2 as “Other Environmental Resource” are H1 Habitat Quiet Zones (100-foot buffers around H1 Habitat) and H3 Habitat. H3 Habitat is the least sensitive of the habitat types and includes areas where the native vegetation communities have been significantly disturbed or removed as part of lawfully established development, areas of native vegetation that are not significantly disturbed but have been substantially fragmented, and areas containing structures and other existing development.

City of Malibu Local Coastal Program Land Use Plan and Local Implementation Program, and City of Malibu General Plan – Sites LEPS and ZHQ

Sites LEPS and ZHQ are within the corporate limit of the City of Malibu. Biological resources at these sites are managed under the City of Malibu Land Use Plan (City of Malibu 2002a) and Local Implementation Plan (City of Malibu 2002b), and the City of Malibu General Plan (City of Malibu 1995).

The City of Malibu Local Coastal Program consists of an LUP and a Local Implementation Plan. The LUP includes Coastal Act policies and LUP policies. The Coastal Act policies cite specific Coastal Act regulations from the California PRC that include defining environmentally sensitive areas (Section 30107.5) and defining and regulating ESHAs (Section 30240). The Land Use Plan policies include ESHA designation and ESHA protection. It also establishes buffers around certain ESHAs.

The City of Malibu General Plan contains a Conservation Element which, in turn, contains conservation goals. The plan’s CON GOAL 1, Natural Resources Preserved and Protected, includes three objectives applicable to biological resources, each of which contains conservation policies. The objectives and abridged policies from the Conservation Element are provided below.

- CON Objective 1.1: Natural Resources Managed in Accordance with this Comprehensive Natural Resources Protection and Management Plan
 - Con Policy 1.1.1: The city shall minimize disruption of natural systems and areas rich in biodiversity and avoid consumption of ecologically sensitive lands (e.g., Resource Protection Areas including ESHAs, and disturbed sensitive resource areas)
 - Con Policy 1.1.3: The city shall protect and preserve and, where reasonable and feasible, reclaim the delicately balanced ecosystem of the Santa Monica Mountains and adjacent coastline area.
 - Con Policy 1.1.4: The city shall protect Environmentally Sensitive Habitat Areas (ESHAs) as a priority over development and against any significant disruption of habitat values.
 - CON Policy 1.1.5: The city shall protect and reclaim Malibu’s threatened natural resources such as the beaches, estuaries, intertidal zone and marine habitats, estuaries, marine life, ocean, tidepools, streams, waterfalls, wetlands, and wildlife and plant life and their habitats.
 - CON Policy 1.1.6: The city shall restore Disturbed Sensitive Resource Areas (DSRAs), to the extent feasible and ecologically desirable.

- CON Policy 1.1.8: The city shall protect land formations and soils by avoiding vegetation removal in Resource Protection Areas and in other areas of high potential erosion hazard.
- CON Objective 1.2: Wildlife and Biota Resources Preserved, Protected, and Reclaimed.
 - CON Policy 1.2.4: The city shall regulate removal of vegetation in ESHAs.
 - CON Policy 1.2.5: The city shall discourage plant species which are invasive in the Santa Monica biogeographic area where such invasive plant species would degrade native plant communities.
 - CON Policy 1.2.6: The city shall discourage the use of insecticides, herbicides, or toxic chemical substances (excepting non-regulated home pesticides) within the city or if ESHAs, raptors, and other animals could be adversely affected, except in an emergency which threatens wildlife or the habitat itself.
 - CON Policy 1.2.7: The city shall reduce impacts resulting from night lighting so as not to disturb natural habitats.
- CON Objective 1.3: Marine and Beach Resources Preserved, Protected, Enhanced, and Reclaimed
 - CON Policy 1.3.5: The city shall protect all sea birds/shore birds and their nesting and roosting sites in ESHAs.
 - CON Policy 1.3.11: The city shall control surface runoff and associated pollutant loads into coastal waters, wetlands, and riparian areas.

County of Los Angeles General Plan - Sites OAT, PHN, RIH, SIM, and TPK

The Los Angeles County General Plan (LACDRP 2015b) includes a Conservation and Natural Resources Element that guides the long-term conservation of natural resources and preservation of available open space areas in unincorporated Los Angeles County. Goal C/NR3 of this element calls for permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and Significant Ecological Areas (SEAs). The policies or portions of policies potentially affecting biological resources at Project sites include:

- Policy C/NR 3.1. Conserve and enhance the ecological function of diverse natural habitats and biological resources
- Policy C/NR 3.8. Discourage development in areas with identified significant biological resources such as SEAs
- Policy C/NR 3.9 (abridged). Consider the following in the design of a project that is located within an SEA, to the greatest extent feasible:

- Preservation of biologically valuable habitats, species, wildlife corridors and linkages
- Protection of sensitive resources on the site within open space
- Placement of the development in the least biologically sensitive areas on the site (prioritize the preservation or avoidance of the most sensitive biological resources on site)
- Consideration of the continuity of on-site open space with adjacent open space in project design

City of Chino Hills General Plan – Site AJT

Site AJT is located within the City of Chino Hills in San Bernardino County. The City of Chino Hills General Plan (City of Chino Hills 2015) contains a Conservation Element that includes goals, policies, and actions that protect biological resources. These are discussed below:

- Goal CN-1: Preserve Chino Hills’ Rural Character
 - Policy CN-1.1: Preserve and protect Chino Hills’ rural and natural scenic qualities
 - Action CN-1.1.8: Preserve existing significant trees where feasible and extensively plant new trees consistent with City tree policies
 - Policy CN1-2: Preserve and protect Chino Hills’ biological resources
 - Action CN-1.2.1: Preserve natural open spaces that act as wildlife corridors
 - Action CN-1.2.2: Discourage new development in areas that contain sensitive, rare, or endangered species, oak woodlands, chaparral, and riparian habitats
 - Action CN-1.2.4: Require City approval to remove trees that in the opinion of the City function as an important part of the City’s or a neighborhood’s aesthetic character

Local Land Use Plans and Ordinances

The Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such local plans, policies, and regulations are not applicable to the Project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, this Draft EIR references, describes, and addresses local land-use plans, policies, and regulations. The Draft EIR takes this approach in recognition that such plans, policies, and regulations reflect the local community’s policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies, and regulations assists in determining whether the proposed Project may conflict with nearby land uses, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts.

City of Agoura Hills General Plan – Site AGH

Section C of Chapter 4 of the Agoura Hills General Plan (City of Agoura Hills 2010) addresses biological resources. Goal NR-4 includes protection of and enhancement of open space, natural areas, and significant wildlife and vegetation to sustain natural ecosystems that contribute to the quality of life and character of Agoura Hills. Policy NR-4.2 “Conserve Natural Resources,” of the general plan stipulates continuance of enforcement of ordinances in new and existing development at an appropriate distance from ridgelines, oak trees, and other environmental resources to prevent erosion, preserve viewsheds, and protect the natural contours of the land. Oak trees scattered throughout the city are protected by the City of Agoura Hills Oak Tree Ordinance.

City of Beverly Hills General Plan – Site WAD

Site WAD is located in the City of Beverly Hills. The city’s General Plan (City of Beverly Hills 2010) open space element requires new construction to minimize disturbance of native vegetation on slopes. One local regulation goal is to maintain the status quo of native vegetation. Another relevant goal is the protection of heritage and other important trees.

City of Calabasas 2030 General Plan – Site ENT

Site ENT is located in the City of Calabasas. The City of Calabasas 2030 General Plan (2015) contains a Conservation Element, which includes several policies identified at protecting biological resources. These include:

- Policy IV-2. Ensure that new developments, including roads, maintain the biotic habitat value of riparian areas, oak woodlands, habitat linkages, and other sensitive biological habitats. Specifically, the following are unacceptable biological impacts:
 - Net loss of wetlands or riparian vegetation
 - Measurable reduction in species diversity
 - Loss of breeding and roosting areas, foraging areas, habitat linkages, or food sources that will result in a measurable reduction in the reproductive capacity of biotic resources
- Policy IV-3. Require new developments on properties that include sensitive biotic habitats to cluster development in the least sensitive portions of the property and preserve and/or restore the most sensitive resources without creating urban development patterns in rural areas
- Policy IV-6. Require separation of construction activities from sensitive biological resources through the use of buffers, setbacks, and temporary protective fencing
- Policy IV-7. Regulate construction activities to eliminate potentially destructive practices that adversely affect environmentally sensitive areas
- Policy IV-9. Continue to enforce the city’s oak tree ordinance

City of Cerritos General Plan – Site ASD

The City of Cerritos General Plan (2004) does not include specific policies to protect other biological resources associated with the proposed Project.

City of Glendale General Plan – Sites FTP and VPK

Sites FTP and VPK are located within the City of Glendale. Policy 1 of the Conservation Element of the City of Glendale General Plan (City of Glendale 2005) promotes the maintenance and restoration of natural resources.

City of Monterey Park General Plan – Site LARICSHQ

Site LARICSHQ is in the City of Monterey Park. The Monterey Park General Plan’s Resources Element (City of Monterey Park 2015) directs policy toward preserving natural resources such as forests, wildlife habitat, or agricultural lands in the urban environment of Monterey Park. These resources include city parks and other improved open space areas, historic resources, water resources, and air quality. There are no specific policies towards biological resources.

City of Palmdale General Plan – Site MMC

The City of Palmdale’s General Plan (1993, 2014a) is consistent with and implements the West Mojave Habitat Conservation Plan (WEMO). In addition, the city has adopted Ordinance No. 952, referred to as the Native Desert Vegetation Ordinance, which is designed to preserve high quality California juniper and Joshua trees that add to community identity and to encourage the use of native vegetation in new development landscaping. The city hillside ordinance protects hillsides with a 10 percent or greater slope from intensive development. The General Plan’s Environmental Resource Goals include preserving open space areas (Goal ER1) and significant ecological resources (Goal ER2) including sensitive flora and fauna habitat areas. Relevant objectives include preserving SEAs and complying with the state and federal endangered species’ acts.

City of Pasadena General Plan – Site PASPD01

Goals outlined in the City of Pasadena’s General Plan (2004) include protecting, restoring, and maintaining native wildlife, native vegetation, and habitat connectivity. Another relevant biological goal is to protect the urban forest on public and private lands.

City of San Dimas General Plan – Site SDW

Site SDW is within the City of San Dimas. The City of San Dimas General Plan (1991) contains a Conservation Element that contains goals and policies addressing biological resources. Goal Statement 1 “*Manage and Conserve San Dimas’ Natural Resources which Contribute and Enhance the Quality of Life*” is the only goal specifically addressing biological resources not associated with residential development. No specific policies associated with proposed Project activities were identified.

City of Santa Monica General Plan – Site WS1

The City of Santa Monica General Plan includes a Conservation Element (1975) that addresses land acquisition for open space, trail improvements, and protection of known biological resources including sensitive species and riparian habitats. The city’s main open space effort is to improve the quality of parks and open space and link them as corridors when possible.

City of Signal Hill General Plan – Site SGH

The City of Signal Hill’s General Plan’s Environmental Resource Element Goal 5 (City of Signal Hill 1989), promotes minimal degradation to the physical environment from development and operations and requires restoration; particularly focusing on air quality, water quality, and hazardous chemicals. There are no goals specific to biological resources.

City of West Hollywood General Plan – Site PDC

The City of West Hollywood’s General Plan (2011) focuses on water supply and energy conservation as well as green building, climate change, and air quality. There are no goals relating to biological resources as the city is built-up and does not contain native habitat.

City of Whittier General Plan – Site H-17A

Site H-17A lies within the City of Whittier. The City of Whittier General Plan (2014) includes an Environmental Resources Management Element that contains goals and policies addressing biological resources. The Environmental Resources Management Element includes Goal 1 “*Preserve or conserve natural and cultural resources that have scientific, educational, economic, aesthetic, social, and cultural value.*” Policy 1.2 encourages practices that stress soil conservation as a means to retain native vegetation, and Policy 1.3 strives to preserve adequate open space for major habitat types. The site includes a water tower, paved road, and two existing communication towers and an old Nike missile site.

3.3.1.7 Habitat Conservation Plans and Natural Community Conservation Plans

Only one plan has been identified that is within the boundary or study area of proposed Project sites. This is the West Mojave Conservation Management Plan. The main goal of the West Mojave Plan (WEMO) is to protect and manage over 100 listed or sensitive species and puts special emphasis on the desert tortoise and the Mohave ground squirrel. Plan objectives include protecting large habitat blocks, avoiding human impacts on conservation areas, considering habitat specialists in conservation efforts, maintaining biodiversity, and providing a streamlined process for incidental take permits. Site MMC is in the WEMO planning area, specifically within the City of Palmdale. Protections afforded biological resources in the City of Palmdale, a signatory to the WEMO, include conservation measures for several species. Many of these measures are activity-specific (i.e., construction of electrical transmission lines). None of the species protected in the WEMO are known to occur at Site MMC.

3.3.2 Regulatory Setting

3.3.2.1 *Federal Regulatory Setting*

Federal Endangered Species Act (16 United States Code [U.S.C.] § 1531 et seq.)

The federal Endangered Species Act of 1973 (ESA) provides for the protection of plant and wildlife species listed by the federal government as endangered or threatened, and “the ecosystems upon which they depend.” An “endangered” species is one that is “in danger of extinction” throughout all or a significant portion of its range. A “threatened” species is one that is “likely to become endangered” within the foreseeable future (16 U.S.C. §1532.) Pursuant to Section 9 of the ESA (codified at 16 U.S.C. §1538), it is unlawful for any person to “take” a federally listed species. “Take,” as defined by the ESA, “means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” This can also include the modification of a species’ habitat. For plants, this statute governs removing, possessing, maliciously damaging, or destroying any listed plant on federal land and removing, cutting, digging up, damaging, or destroying any listed plant on non-federal land in knowing violation of state law (16 U.S.C. § 1538(c)). When non-federal entities such as states, counties, local governments, and private landowners wish to conduct an otherwise lawful activity that might incidentally, but not intentionally, “take” a listed species, an incidental take permit (issued pursuant to ESA § 10(a)(1)(B)) must first be obtained from USFWS (or NMFS), through the development of a habitat conservation plan. Under Section 7 of the ESA, federal agencies involved in the action must consult with USFWS and/or NMFS if the federal agencies determine that their actions may affect listed species or critical habitat. Section 7 and its implementing regulations direct all federal agencies to ensure that any action they authorize, fund, or carry out does not jeopardize the continued existence of an endangered or threatened species, or result in the destruction of adverse modification of designated or proposed critical habitat. The regulations for implementation, 50 CFR Part 402, specify how federal agencies are to fulfill their Section 7 consultation requirements. To accomplish this, federal agencies must request from the USFWS a list of species and critical habitat that may be in the study area; or they can request concurrence with their species list. Once a species list is obtained or verified as accurate, agencies need to determine whether actions may affect any of those species or their critical habitat. This consultation will conclude either informally with written concurrence from USFWS or through formal consultation with a No Jeopardy Biological Opinion provided to the federal agency.

Migratory Bird Treaty Act (16 U.S.C. §§ 703 - 712)

The Migratory Bird Treaty Act of 1918 (MBTA) protects species of native migratory birds listed under the MBTA. Specific provisions in the statute include a federal prohibition, except as allowed under specific conditions, to: “pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export ...any migratory bird, included in the terms of the conventions.” The prohibitions apply to migratory birds (including any part, nest, or egg) listed

pursuant to the United States' conventions (treaties) with Great Britain, Mexico, Japan, and the Soviet Union (now Russia) (16 U.S.C. § 703).

Bald and Golden Eagle Protection Act (16 U.S.C. § 668c)

The Bald and Golden Eagle Protection Act of 1940 (BGEPA) provides for the protection of bald and golden eagles. The BGEPA establishes criminal penalties for persons who “take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... or any golden eagle, alive or dead, or any part, nest, or egg thereof.” The BGEPA implementing regulations define “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.”

Clean Water Act of 1972

Enacted in 1972, the federal Clean Water Act (CWA) and subsequent amendments outline the basic protocol for regulating discharges of pollutants to waters of the United States. It is the primary federal law applicable to water quality of the nation's surface waters, including lakes, rivers, and coastal wetlands. Enforced by the U.S. Environmental Protection Agency (USEPA), it was enacted “... to restore and maintain the chemical, physical, and biological integrity of the Nation's waters.” The CWA authorizes states to adopt water quality standards and includes programs addressing both point and non-point pollution sources. The CWA also established the National Pollutant Discharge Elimination System (NPDES), and provides USEPA the authority to implement pollution-control programs, such as setting wastewater standards for industry and water quality standards for surface waters (see below for a discussion of the NPDES program). In California, programs and regulatory authority under the CWA have been delegated by USEPA to the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs). Under Section 402 of the CWA, potential discharges are regulated by the NPDES permit process, which requires projects that disturb one or more acres to obtain NPDES coverage under the General Permit for each state (CWA Section 402). The SWRCB and RWQCBs have also developed numeric and narrative water quality criteria to protect beneficial uses of state waters and waterways.

Section 401 – Water Quality Certification

Section 401 of the CWA specifies that, for any activity that may result in a discharge into waters of the United States, the SWRCB or applicable RWQCB must certify that the discharge will comply with state water quality standards, including beneficial uses (23 CCR 3830, et seq.). Under California's policy of no net loss of wetlands, the SWRCB and RWQCBs require mitigation for dredge and fill impacts to wetlands and waterways. Dredge and fill activities in wetlands and waterways that impact waters of the United States require a federal Section 404 permit from the U.S. Army Corps of Engineers (USACE). Before a Section 404 permit can be issued, a Section 401 certification must first be obtained from the RWQCB.

Section 404 – Permitting for Dredge and Fill Activities in Wetlands and Waters of the United States

USACE is responsible for issuing permits under CWA Section 404 for placement of fill or dredged material in waters of the United States and jurisdictional wetlands. In general, “waters” is a term used to denote the USACE jurisdictional limits under CWA Section 404. “Waters” include oceans, bays, rivers, streams (including non-perennial streams with a defined bed and bank), lakes, ponds, and seasonal and perennial wetlands. Navigable rivers, streams, washes, natural ponds, lakes, bays, wetlands, and certain canals have historically been considered “waters.” New regulations known as the Clean Water Rule recently redefined “waters” and was published in the Federal Register (40 CFR 230.3) on June 29, 2015, effective August 28, 2015. Since its publication, numerous lawsuits have been filed challenging the regulation. The U.S. Court of Appeals for the Sixth Circuit issued a nationwide stay of the new regulation on October 9, 2015. The USEPA and USACE are currently enforcing prior regulations defining “waters” (USEPA 2015a). Project proponents must obtain a permit from USACE for all discharges of fill or dredged material before proceeding with a proposed activity. USACE may issue either an individual permit or a general permit. General permits are preauthorized at the regional or national level and are issued to cover activities expected to result in only minimal adverse environmental effects (e.g., Los Angeles District Regional General Permit No. 63 for Repair and Protection Activities in Emergency Situations). Nationwide Permits (NWP) are a type of general permit issued to cover activities that USACE has determined to have minimal adverse effects, such as routine maintenance (Nationwide Permit 3) or utility line activities (Nationwide Permit 12). Each NWP specifies particular conditions that must be implemented by the permittee, including impact thresholds. NWP are typically limited to projects of less than 0.5 acre of permanent impacts to waters of the United States for each single and complete project. If an NWP does not apply to a project, a project is required to obtain an individual permit.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (MSA), as amended by the Sustainable Fisheries Act of 1996 (Public Law 104-267), requires federal agencies to consider activities that may adversely affect Essential Fish Habitat (EFH) designated for certain marine species (e.g., groundfish [a guild of bottom-dwelling marine fishes], salmonids, pelagic species, and highly migratory species). The objective of an EFH assessment is to determine whether the proposed action(s) “may adversely affect” designated EFH for relevant commercial, federally managed fisheries species. For the proposed Project, these species are identified in the Pacific Coast Groundfish Fishery Management Plan. It also describes conservation measures proposed to avoid, minimize, or otherwise offset any identified potential effects to designated EFH resulting from proposed activities. The coastal Pacific Ocean and several harbors and bays in southern California have been designated as EFH for groundfish by NMFS. Habitat areas of particular concern (HAPCs), a subset of EFH, also occur in southern California. Along coastal Los Angeles County, these include estuarine, sea grass, and rocky reef HAPCs (NMFS 2015).

Coastal Zone Management Act

The federal Coastal Zone Management Act (CZMA) of 1972 applies to federal activities, development projects, permits and licenses, and similar project activities that would be located within coastal

resources or have the potential to affect them. Congress later delegated coastal resource management to states' coastal management programs. See the California Coastal Act under Section 3.3.2.2 State Regulatory Setting.

3.3.2.2 State Regulatory Setting

California Fish and Game Code Sections 1600-1616, Lake and Streambed Alteration Program

Sections 1600-1616 of the FGC protect the natural flow, bed, channel, and bank of any river, stream, or lake designated by the CDFW in which is present, at any time, any existing fish or wildlife resources, or benefit for the resources. CDFW regulates activities that could alter the flow, bed, banks, channel or associated riparian areas of a river, stream or lake—all considered “waters of the State.” The law requires any person, state or local governmental agency, or public utility to notify CDFW before beginning an activity that may substantially modify a river, stream, or lake. A Lake or Streambed Alteration Agreement may be required for any project that would:

- Divert, obstruct, or substantially change a streambed
- Use material from the streambed
- Alter the bed, banks, channel, or the adjacent riparian vegetation of a streambed
- Result in the disposal, or deposition of debris, waste, or other material containing crumbled, flaked, or ground pavement where it can flow into a stream

California Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1967 (Cal. Water Code § 13000, et seq.) requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The RWQCBs have the responsibility of granting NPDES permits for stormwater runoff from construction sites. In addition, the Porter-Cologne Act also covers non-federal waters of the State that may not be subject to requirements of the CWA, such as isolated waters. For fill or dredging impacts to only isolated waters of the State, the RWQCBs may issue Waste Discharge Requirements; otherwise, the CWA Section 401 Water Quality Certification (described above) typically addresses both waters of the State and waters of the United States.

California Coastal Act

In 1976, the California State Legislature passed the California Coastal Act (CCA), which established a comprehensive coastal protection program and secured the California Coastal Commission's (CCC's) role as the state agency responsible for the protection of coastal resources. The CCA provides for the transfer of most of the authority to local governments through adoption and certification of Local Coastal Programs (LCPs). The LCPs contain the rules for future development and protection of coastal resources, including appropriate location, type, and scale of new or changed uses of land and water.

Each LCP includes a land use plan and measures to implement the plan (such as zoning ordinances) (CCC 2014). Once an LCP has been certified, a local government may issue coastal development permits.

The CCC is tasked with protection of coastal resources, including shoreline public access and recreation, lower-cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. Development in the coastal zone usually requires a coastal development permit. Development activities include, but are not limited to, construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters. The CCC issues coastal development permits, although a local agency takes over this responsibility once an LCP has been certified by the CCC (CCC 2001; Government Printing Office 1977).

California Endangered Species Act (California Fish and Game Code § 2050, et seq.)

The CESA generally parallels the provisions of the federal ESA, and states that “all native species of fishes, amphibians, reptiles, birds, mammals, invertebrates, and plants, and their habitats, threatened with extinction and those experiencing a significant decline which, if not halted, would lead to a threatened or endangered designation, will be protected or preserved.” The CDFW administers the CESA and has committed itself to work with all interested persons, agencies, and organizations to protect and preserve such sensitive resources and their habitats.

Under the CESA, “endangered” is defined as “a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range;” and “threatened” is defined as “a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts.” “Take” is defined as “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill” an individual of a species; the definition does not include “harm” or “harass,” as the federal ESA does. As a result, the threshold for a take under the CESA is higher than that under the federal ESA.

Consistent with the CESA, CDFW has established lists of endangered, threatened, and candidate species that may or may not also be included on federal ESA list. Pursuant to FGC Section 2081, CESA allows for incidental take permits to otherwise lawful development projects that could result in the take of a state-listed threatened or endangered species. The application for an incidental take permit under Section 2081(b) has a number of requirements, including the preparation of a mitigation plan. CESA emphasizes early consultation to avoid potential impacts to rare, endangered, and threatened species and to develop appropriate mitigation planning to offset project-caused losses of listed species.

Native Plant Protection Act (California FGC §§ 1900-1913, § 2062 and § 2067)

The CNPPA identifies the types of plant species eligible for state listing. Eligible species include those identified by CRPR 1A, 1B, 2A, and 2B and that meet the definitions of Section 1901, Chapter 10 (CNPPA) or Sections 2062, 2067, and 2068 (CESA) of the FGC. Plants ranked as CRPR 3 or 4 do not necessarily meet the criteria for endangered, rare, or threatened in CEQA Guidelines Section 15380 but can be addressed in CEQA documents depending on the circumstances and professional opinion of the biologist conducting the assessment. CRPR definitions are as follows:

- 1A: Plants presumed to be extinct because they have not been seen or collected in the wild in California for many years. This rank includes plants that are presumed extinct in California as well as those plants that are presumed extirpated in California. A plant is extinct in California if it no longer occurs in or outside of California. A plant that is extirpated from California has been eliminated from California but may still occur elsewhere in its range.
- 1B: Plants are rare throughout their range, with the majority of them endemic to California. Most of the plants of CRPR-1B have declined significantly over the last century.
- 2: Plants that are rare throughout their range in California but are more common beyond the boundaries of California. CRPR 2-recognizes the importance of protecting the geographic range of widespread species.
- 3: A review list for plants for which there is inadequate information to assign them to one of the other lists or to reject them.
- 4: A watch list for plants that are of limited distribution or infrequent throughout a broader area in California and their vulnerability or susceptibility to threat appears relatively low at this time.

California FGC Sections 3500-3516

California FGC Section 3513 furthers the intent of the MBTA by prohibiting any take or possession of birds in California that are designated by the MBTA as migratory non-game birds, except as allowed by federal rules and regulations promulgated pursuant to the MBTA. In addition, FGC Sections 3503, 3503.5, 3511, further protect nesting birds and their parts, including passerine birds, raptors, and state “fully protected” birds. These regulations protect almost all native nesting birds.

California FGC Sections 3511, 4700, 5050, and 5515

California FGC Sections 3511, 4700, 5050, and 5515 list the bird, mammal, reptile, amphibian, and fish species that are identified as “fully protected.” Fully protected wildlife may not be harmed, taken, or possessed. The classification of “fully protected” was California’s initial effort to identify and provide additional protection to those wildlife that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under the CESA and federal ESA: white-tailed kite, golden eagle, trumpeter swan, northern elephant seal, and ring-tailed cat are the exceptions. The white-tailed kite and the golden eagle are

tracked in the California Natural Diversity Database (CNDDDB); the trumpeter swan, northern elephant seal, and ring-tailed cat are not. Incidental take of fully protected species may be authorized through approved Natural Community Conservation Plans (FGC Sections 2805(e), 2835). California Desert Native Plants Act, Food and Agricultural Code Sections 80071-80075

The California Desert Native Plants Act was passed in 1981 to protect non-listed California desert native plants from unlawful harvesting on both public and privately owned lands. Harvest, transport, sale, or possession of specific native desert plants is prohibited unless a person has a valid permit, or wood receipt, and the required tags and seals. Native plants declared to be rare, endangered, or threatened by federal or state law or regulations are exempt from this act.

3.3.2.3 Local Regulatory Setting

In addition to the federal and state regulations aimed at the protection of biological resources, counties and cities with jurisdiction of Project sites typically acknowledge the values of natural resources and their contributions to the quality of local communities in planning documents or the municipal code. Planning documents may reiterate the importance of coastal resource areas (CRAs) or other special designations (e.g., SEAs) but recognize the state or federal regulatory agency role in implementation and compliance of the laws and regulations. Ordinances and identified permit requirements specific to local jurisdictions and that may apply to the proposed Project are noted below. Applicable local regulations are identified by Project site in Chapter 4.

Los Angeles County

Hillside Management and Significant Ecological Areas Ordinance

A Significant Ecological Area (SEA) designation is given to land that contains irreplaceable biological resources. Individual SEAs include undisturbed or lightly disturbed habitat supporting valuable and threatened species, linkages, and corridors to promote species movement and are sized to support sustainable populations of its component species. The objective of the SEA Program is to preserve the genetic and physical diversity of the county by designing biological resource areas capable of sustaining themselves into the future. The SEA ordinance is the primary mechanism that the County uses to regulate development within the SEAs. Properties mapped within, or partially within, an adopted SEA are subject to the rules in the SEA ordinance, in addition to other applicable regulations of the zoning code. Conditional use permits are required for most development within SEAs to protect resources contained in significant ecological areas and in hillside management areas as specified in the County General Plan from incompatible development (LACDRP 2014, 2015).

City of Agoura Hills

Oak Tree Permit

The policy of the City of Agoura Hills is to require the preservation of all oak trees unless compelling reasons justify the removal of such trees. The regulations specify that no person, partnership, firm, corporation, government agency, or other legal entity shall cut, prune, remove, relocate, endanger or

damage any tree protected by the municipal on any public or private land located within the incorporated areas of the City of Agoura Hills except in accordance with the conditions of a valid oak tree permit. An oak tree permit is required prior to cutting or removing an oak tree with a diameter greater than 2 inches measured at 42 inches above the natural grade (City of Agoura Hills 2015).

City of Glendale

Indigenous (Protected) Tree Permit

City ordinance number 5719 (adopted December 7, 2010) amended Chapter 12.44 of the City Code, which provides for the protection of indigenous oak, bay, and sycamore trees within the city. A permit is required of any person who proposes to cut, remove, encroach upon, or relocate a protected indigenous tree if the trunk of the tree is more than 6 inches in diameter when measured 54 inches above the lowest point where the tree meets the soil (City of Glendale 2015).

City of Lancaster

Biological Impact Fee

To address the incremental effect of new development on biological resources, including loss of habitat and reduction in total numbers of flora and fauna on a regional basis, the City of Lancaster imposes a biological impact fee on new development of land within the city. Chapter 15.66 of the municipal codes establishes the adoption, collection, administration, and use of the biological impact fee (City of Lancaster 2015).

City of Palmdale

Joshua Tree and Native Desert Vegetation Preservation

Chapter 14.04 of the Palmdale municipal code specifies that development projects should strive to protect and maintain the most desirable and significant of the healthy desert vegetation in a manner consistent with the City General Plan and CEQA (Ordinance 952 §2, 1992) (City of Palmdale 2015).

3.3.3 Significance Criteria

The proposed Project would have a significant impact on biological resources if any of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met. Impact thresholds are established for each criterion to determine significance.

- 1) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, or on any species that meets the criteria in CEQA Guidelines Section 15380 for endangered, rare or threatened?

Significance Threshold: The project would result in a significant impact if the project construction and/or operational impacts would have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or

regulations, or by the CDFW, USFWS, or other land administering agency (for lands under its jurisdiction), or any species that meets the CEQA Guidelines criteria for endangered, rare, or threatened. A substantial adverse effect would occur if the proposed Project resulted in injury, loss, or mortality of individuals; disturbance that could result in disruption of life functions; if impact(s) to habitat would result in a local decline in the species' distribution or the suitability of that habitat to support the local population of that plant or animal species at current levels; or for migratory birds, if Project activities are out of compliance with the voluntary guidelines issued by the USFWS Office of Migratory Birds (USFWS 2013a) for communications tower placement, construction, and operation.

- 2) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CDFW or USFWS?

Significance Threshold: The project would result in a significant impact if the project construction and/or operational impacts would have a substantial adverse effect on any riparian or wetland habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS. An adverse effect would include altering the function of or ecological processes associated with these special natural communities; or the loss of an individual mature deciduous riparian tree or the alteration of other natural features (e.g., vernal pool) that would require an extended period of time to replace.

- 3) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Significance Threshold: The project would result in a significant impact if the project construction and/or operational impacts would cause the direct removal, filling, or hydrological interruption of federally protected wetlands or waters of the United States as defined by Section 404 of the Clean Water Act.

- 4) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Significance Threshold: The project would result in a significant impact if the project construction and/or operational impacts would result in a new permanent barrier within known migratory and/or wildlife movement corridors; or would interfere substantially with the movement of any native resident or migratory fish or wildlife species, disrupt established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

- 5) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Significance Threshold: The project would result in a significant impact if the construction and/or operation of the project would result in substantial adverse effects to biological resources protected under local policies or ordinances.

- 6) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Significance Threshold: The project would result in a significant impact if the construction and/or operation of the project would conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan as defined by those policies or ordinances. An example of this would be if the action were to have an adverse effect on protected biological resources outlined in the plan.

3.3.4 Impact Analysis

The evaluation of potential impacts to biological resources is based on an assessment of whether a particular resource element (e.g., species, habitat, special community, wildlife linkage zone) occurs within a study area and, where those resources are present, whether impacts to the resource element might occur as a result of proposed Project implementation. The presence of a resource element within a study area does not imply that an impact would necessarily occur to that resource element. Where these resource elements potentially coincide with proposed Project activities, however, focused site-specific evaluations are conducted to identify the potential for impacts. Where a potential for impacts to these resource element(s) exists, specific mitigation measures may be applied on a case-by-case basis.

3.3.4.1 *Proposed Project*

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, or on any species that meets the criteria in CEQA Guidelines Section 15380 for endangered, rare or threatened?

Of the 112 special status plant species and 74 special status wildlife species reviewed to determine potential impacts due to construction or operations at any of the 54 proposed Project sites, 44 species were identified that may have potentially suitable habitat generally within 500 feet from one or more of 49 proposed Project sites (Table 3.3-7). In addition, this list includes those species that were evaluated based on a more broad geographic criteria, such as a dispersal distance of up to 2 miles for special status amphibians, and the presence of extensive open space for wide-ranging birds (i.e., California condor, golden and bald eagles, and peregrine falcon). Note that non-special status birds that are protected under the MBTA are addressed below as their own category of protected species. The potential impacts of Project activities to special status species were then addressed on a site-specific basis. The evaluation considered whether Project activities could result in disruption of normal behavior patterns, mortality or injury of individuals, or the loss of occupied or suitable habitat, and included the following elements:

- Proposed Project actions/type of development
- Current facilities and site use
- Habitat present with each proposed Project site
- Habitat present in each study area
- Potential extent of indirect disturbances (e.g., noise, presence of people)
- Sensitivity of individual species to indirect disturbances
- Application of mitigation measures to avoid, minimize impacts

Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
American peregrine falcon (<i>Falco peregrinus anatum</i>)	CA-FP	AGH, BJM, CPK, DPK, ENT, FTP, H-69B, JOP, LACFCP08, MTL2, PWT, SPN, TOP, TWR, VPK, WTR
arroyo toad (<i>Anaxyrus californicus</i>)	ESA-E ESA-CH CDFW-SSC	JOP, LACFCP11, WMP
bald eagle (<i>Haliaeetus leucocephalus</i>)	BGEPA CA-E CDFW-FP USFS-Sens	BJM, DPK, GMT, TWR
Big Bear Valley woollypod (<i>Astragalus leucolobus</i>)	CRPR-1B.2	TMT
Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	ESA-E ESA-CH CRPR-1B.1	AGH, CPK, ENC1, ENT, GRM, H-69B, LACF072, LACFCP08, PWT, SPN, TOP
burrowing owl (<i>Athene cunicularia</i>)	CDFW-SSC	H-17A
California condor (<i>Gymnogyps californianus</i>)	ESA-E ESA-CH CA-E CDFW-FP	BUR, BUR1, BUR2, BUR3, FRP, FTP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, VPK, WMP, WTR
California dissantherium (<i>Dissantherium californicum</i>)	CRPR-1B.2	BJM
California mountain kingsnake (<i>Lampropeltis zonata</i>)	CDFW-SSC USFS-Sens	H-69B, SPN, TOP
California red-legged frog (<i>Rana draytonii</i>)	ESA-T ESA-CH CDFW-SSC	CPK, GRM, H-69B, JOP, LACFCP08, LACFCP09, LPC, MML, MTL2, PWT, SPN, TOP, WMP, WTR

Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
coast horned lizard (<i>Phrynosoma blainvillii</i>)	CDFW-SSC	CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, TPK
coastal California gnatcatcher (<i>Polioptila californica californica</i>)	ESA-T ESA-CH CDFW-SSC	H-17A, LEPS, PHN, PWT, RIH, SDW, VPK
Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	CRPR-1B.2	LACFCP09, LPC, MTL2, VPK
decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	CRPR-1B.2	TWR
golden eagle (<i>Aquila chrysaetos</i>)	BGEPA CDFW-FP	AGH, AJT, CPK, ENC1, LACFCP08, OAT, TPK
Greata's aster (<i>Symphyotrichum greatae</i>)	CRPR-1B.3	JOP
grey-leaved violet (<i>Viola pinetorum</i> var. <i>grisea</i>)	CRPR-1B.3	TMT
intermediate mariposa-lily (<i>Calochortus weedii</i> var. <i>intermedius</i>)	CRPR-1B.2 USFS-Sens	H-17A, RIH
island rush-rose (<i>Crocانthemum greenei</i>)	ESA-T CRPR-1B.2	BJM, DPK, TWR
long-eared owl (<i>Asio otus</i>)	CDFW-SSC	AJT
Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	ESA-E ESA-CH CA-E CRPR-1B.1	AGH, ENT, LACF072, TWR
marcescent dudleya (<i>Dudleya cymosa</i> ssp. <i>marcescens</i>)	ESA-T CA-R CRPR-1B.2	LACF072
Monarch butterfly (<i>Danaus plexippus</i>)	ESA-Pet USFS-Sens	Migratory: CPK, GRM, LACFCP08, PDC, PWT, SPN, WS1, ZHQ Roosting: ENC1, ENT, H-69B, LACF072, LEPS, TOP, WAD
mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	ESA-E ESA-CH CA-E USFS-Sens	FRP, JOP, LACFCP09, LPC, PMT, SUN, SUN2 TMT
Rock Creek broomrape (<i>Orobanche valida</i> ssp. <i>valida</i>)	CRPR-1B.2 USFS-Sens	PMT
round-leaved filaree (<i>California macrophylla</i>)	CRPR-1B.1	BJM, CPK, JPK, JPK2, TWR

Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
San Antonio milk-vetch (<i>Astragalus lentiginosus</i> var. <i>antonius</i>)	CRPR-1B.3 USFS-Sens	FRP, TMT
San Diego woodrat (<i>Neotoma lepida intermedia</i>)	CDFW-SSC	RIH
Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	CRPR-1B.2	DPK, TWR
Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	ESA-E CA-T	BJM, DPK, TWR
Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	ESA-E CRPR-1B.1	BJM, DPK
Santa Monica dudleya (<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>)	ESA-T CRPR-1B.1	LACF072
Santa Susana tarplant (<i>Deinandra minthornii</i>)	CA-R CRPR-1B.2	LEPS
slender mariposa-lily (<i>Calochortus clavatus</i> var. <i>gracilis</i>)	CRPR-1B.2	WTR
Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	CRPR-2B.2 USFS-Sens	ENC1, LACF072, LEPS
southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	ESA-E ESA-CH CA-E	LACFCP11
Tehachapi pocket mouse (<i>Perognathus alticolus inexpectatus</i>)	CDFW-SSC USFS-Sens	TPK
Townsend's big-eared bat (<i>Corynorhinus townsendii</i>)	CA-PT CDFW-SSC USFS-Sens	BJM
unarmored threespine stickleback (<i>Gasterosteus aculeatus williamsoni</i>)	ESA-E CA-E	LACFCP11
Wallace's nightshade (<i>Solanum wallacei</i>)	CRPR-1B.1	BJM
western mastiff bat (<i>Eumops perotis californicus</i>)	CDFW-SSC	OAT
western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	ESA-T ESA-CH CDFW-SSC	ZHQ
white-veined monardella (<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>)	CRPR-1B.3 USFS-Sens	GRM
Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)	CRPR-1B.2	TWR

ESA-Endangered Species Act; CA-California; E-Endangered; T-Threatened; C-Candidate; Pet-Petitioned; PT-Proposed Threatened; CH-Critical Habitat; BGEPA-Bald and Golden Eagle Protection Act; USFS-Sens-United States Forest Service Sensitive;

Table 3.3-7: Species with Suitable Habitat Generally within the Study Areas

Species	Status Designations	Proposed Project Site Study Area(s)
MSA-Magnuson-Stevens Fishery Conservation and Management Act; R-Rare under the California Native Plant Protection Act; FP-Fully Protected; CDFW-California Department of Fish and Wildlife; SSC-Species of Special Concern; CRPR-California Rare Plant Ranks; 1A- Plants presumed extirpated in California and either rare or extinct elsewhere; 1B- Plants Rare or Endangered in California and elsewhere; 2B- Plants Rare, Threatened, or Endangered in California, but more common elsewhere.		

The following discussion includes an analysis of individual species.

California Condor

The California condor is an inquisitive bird and comes in contact with a variety of situations over the large expanse of its range. Condors are known to visit mountaintop communication facilities and perch on towers with suitable structure. Threats to condors include poisoning, predation, power line collision and electrocution, shooting, habitat destruction, consumption of microtrash, and habituation to people and man-made objects. Lead and other chemicals have continued to be a threat to condors. The condor ingests toxic substances (primarily lead bullet fragments) while feeding on contaminated carrion. Small pieces of man-made materials (microtrash), such as plastics, wires, bolts, nuts, and glass, are a significant threat to the California condor (USFWS 2012, 2013b). As natural scavengers, condors are attracted to these types of items within their habitat, often mistaking them as mineral supplements. These items can be ingested by adults or fed to young and result in injury or death. Microtrash was found in six of the seven successful condor nests in 2013 (USFWS 2013b). Presence of trash within the condor diet is a direct result of increased human presence within the condor's range and has been noted particularly in the southern California population of condors (USFWS 2013b). Habituation of condors to human activity and structures can compromise the bird's ability to survive. The interaction with humans can lead to reduced natural survival skills, such as foraging and predator avoidance, or put the bird in greater danger of being shot, ingesting trash, or becoming entangled in cables and other debris at developed facilities. Additionally, these social birds may cause other condors to also become habituated to a situation, thereby increasing the threat to a larger number of birds (USFWS 2012).

Twenty five proposed Project sites provide potentially suitable habitat for the California condor. These sites already include developed facilities and are generally within or adjacent to large expansive open space. Some sites, such as WTR and WMP, are in close proximity to active condor use areas; and suitable nesting habitat such as rocky outcrops and steep canyons may be found in the vicinity surrounding these study areas. No known condor nest sites are in proximity to any proposed Project sites; USFWS closely monitors potential nesting by condors. Condors have an expansive foraging range, and as the reintroduced population grows and birds gain more experience, the condor appear to be flying farther afield (see USFWS GPS data sets at USFWS 2015). Currently, condors rarely take exploratory flights into the San Gabriel Mountains or over desert flats; however, Project sites in these areas are evaluated for impacts to condors to address any future concerns.

Construction Impacts

The proposed site developments include construction of a new communications tower, installation of associated infrastructure, and modification of facilities currently present on site. Construction activities would occur over a period of about six weeks at each individual site, and the increased human activity at the site could draw condors to the area due to their inquisitive nature and contribute to increasing levels of habituation of condors to humans and human-made structures. Though construction activities would not involve any blasting, concrete/asphalt cutting would be required, which could temporarily increase the noise produced at the site and with the disturbance associated with construction could result in condors avoiding foraging in the area. However, the condor utilizes a huge foraging range, flying up to 150 miles a day (<http://www.fws.gov/cno/es/CalCondor/Condor.cfm>; USFWS Pacific SW Region - California condor webpage), and any slight and temporary change in a condor's flight path would be within normal behavior patterns. Conversely, construction activities and the presence of a new communication tower could potentially attract condors to the Project site where trash, discarded food, and other materials could be consumed by condors. All construction would be in association with a developed facility, within or immediately adjacent to previously disturbed areas. At all but two proposed Project sites some type of tower or antenna is present, though at many sites the proposed tower would be the tallest at that site. The two sites that do not currently have towers (LACFCP09 and LACFCP11) have extensive development and many occupied buildings. New monopoles are proposed for these sites. The existing access roads would not be modified, and minimal native perennial vegetation would be removed. Therefore, no Project-related loss or fragmentation of condor foraging habitat would occur.

Impacts to California condors from proposed Project construction would be significant at sites BUR, BUR1, BUR2, BUR3, FRP, FTP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, VPK, WMP, and WTR.

Operational Impacts

When erected, the proposed communication towers may or may not include horizontal surfaces (e.g., T-arms on monopoles, or lattice structure) that would be suitable for perching by large birds, thereby facilitating the presence of condors in areas frequented by people and possibly contributing to their habituation to human presence. No guy wires would be used. Towers could present a potential threat of collision to condors; however, no incidents of condors colliding with communication towers have been recorded, though power lines have been an issue. The USFWS has previously concluded that electrical transmission towers are not likely to adversely affect California condors if the appropriate measures are implemented (USFWS 2010b).

In addition to the communication towers, other facilities are present in the vicinity of proposed Project sites, including water tanks, oil rigs and pipelines, power lines and poles, as well as workers that are regularly present at these sites. Many of these other facilities provide elevated horizontal surfaces suitable for condors to perch. Some of these facilities and towers have anti-perch devices, but observations suggest these devices are not consistently placed or maintained. Since the presence of

condors at man-made structures is not desirable from the perspective of management of the condor population, the USFWS Hopper Mountain National Wildlife Refuge monitors the activity patterns of condors via radio and satellite telemetry. If condors are repeatedly converging on developed sites, condor biologists are dispatched to discourage condors from use of those sites.

Impacts to California condor from proposed Project operations would be significant at sites BUR, BUR1, BUR2, BUR3, FRP, FTP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, VPK, WMP, and WTR.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that provide potentially suitable habitat for the California condor (see Table 3.3-7):

BIO MM 1 Conservation Monitoring and Reporting Plan

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the proposed Project. The MMRP would serve to organize environmental compliance requirements identified in best management practices, mitigation measures, permit requirements, real property agreement conditions, and other applicable sources. The MMRP shall contain an organization chart and communication plan for environmental compliance as it relates to the proposed Project.

BIO MM 2 Worker Environmental Awareness Program

Prior to construction, the Authority shall develop and implement or require the system contractor to develop and implement a Worker Environmental Awareness Program (WEAP) for the proposed Project. This mitigation measure would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources.

- a) A WEAP shall be developed and shall be required for all construction employees prior to placement of Project equipment, construction, or any ground-disturbing activities at the proposed Project site. Training of additional workers, contractors, and visitors shall be provided, as needed.
- b) The WEAP is to inform on-site workers of the possible presence of special status species, the measures to be taken to protect these species, and the importance of minimizing impacts to the natural environment through the protection of native vegetation, adhering to required buffers and protection zones, staying on existing roads, and implementing best management practices that include containment of any spills, disposal of trash, and management of runoff and sediment transport.

- c) To assure long-term implementation of mitigation measures, an information sheet listing potential sensitive species and what to do if any are encountered shall be prepared, distributed to workers, and posted on site.

BIO MM 3 Biological Compliance Reporting

A biological monitor shall visit all active construction sites at least once weekly to document compliance and provide reports to the Project administrator on a weekly basis.

BIO MM 4 Site Sanitation

- a) The contractor shall keep a regulated work area free of litter and trash. Trash and discarded food items shall be contained within an appropriate receptacle and removed daily to avoid attracting wildlife to the construction site, contribute to habituation of wildlife to the presence of humans, or to attract avian or mammalian predators to the area.
- b) All construction debris (including nuts, bolts, small pieces of wire, etc.) shall be cleaned up (e.g., trash removed, scrap materials picked up) each day that work is conducted to minimize the likelihood of wildlife visiting the site and consuming microtrash, discarded food, or other substances.

BIO MM 5 Hazardous Materials Management

- (a) A toxic substance management and spill response plan shall be prepared by the contractor.
- (b) Hazardous materials shall be contained; spills shall be prevented; and any spills at the Project site or along access roads shall be contained and cleaned up immediately.
- (c) All construction vehicles are required to carry at least one spill response kit.
- (d) Any spills shall be accounted for in reports prepared by the biological/environmental monitor.

BIO MM 6 Anti-perch Devices

Anti-perch devices shall be affixed to any elevated, horizontal structure (this includes the top quarter-arc of disc antennas) suitable for perching or nesting by raptors, ravens, vultures, gulls, or other large birds to deter the use of these facilities as perch or nest sites to avoid attracting avian predators to the area, and so as not to contribute to the habituation of condors to the presence of humans. Anti-perch devices shall be inspected annually and repaired as needed.

BIO MM 7 California Condor Protection

- a) As part of BIO MM 4 Site Sanitation, a written list of procedures shall be established and posted on site and/or kept in a site binder at all times. Specifically, the protocol shall list requirements including: all trash of any size shall be placed and contained in covered containers; and no trash of any kind shall be released to the environment. This includes any food items, small or large pieces of plastic or wire, and any small metallic objects (i.e., nuts, bolts, wire nuts).
- b) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of California condors. A qualified biologist shall prepare an informational handout to be presented at WEAP instruction. This program and handout shall provide, at a minimum, information concerning the biology and distribution of the California condor, legal status, and possible occurrence in the vicinity; measures to avoid impacts to condors; procedures to be implemented to eliminate microtrash from the site; and what to do in case of California condor encounters. The informational handout shall be posted at the Project site for continued reference by construction and maintenance workers.
- c) During construction and operations of the facility, all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the Project site. If condors are on site, USFWS would be contacted immediately (Ventura office: 805-644-1766) following internal chain-of-command communications protocol. Once condors leave on their own accord or as a result of techniques employed by permitted USFWS personnel, on-site work may continue.
- d) If condors are known to be present in the area and found roosting within 0.5 mile of the Project site, no construction activity shall occur between one hour before sunset and one hour after sunrise or until the condors leave the area.
- e) If condors are documented nesting within 1.5 miles of a proposed Project site (as determined by nesting bird surveys, observations by the biological monitor, and/or information from USFWS condor program), no construction activity shall occur until further authorization is received from USFWS.
- f) The Project site shall be maintained in a clean condition at all times.
- g) All wires, cables, and other items, either temporary or permanent, that could entangle a condor are to be securely fastened down or removed from site. No permanent guy wires will be used.

- h) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that the Project site is maintained in a clean condition.

Impacts after Mitigation

Mitigation measures specific to California condors (BIO MM 1 through BIO MM 7) include maintaining a clean site during and after construction activities, as well as during normal operations and maintenance of the facility, to prevent consumption of microtrash by condors (BIO MM 4 and BIO MM 7). Requirements include a worker environmental awareness program (BIO MM 2), immediate cleanup of all materials (BIO MM 4), and establishing provisions for how each hazardous substance will be treated in case of leakage or spill (BIO MM 5). Anti-perch devices would be installed as needed (BIO MM 6); all wires, cables, and other items that could entangle a condor are to be securely fastened down (BIO MM 7). Adherence to these measures would be overseen by a biological monitor (BIO MM 1 and BIO MM 3).

With the implementation of these measures (BIO MM 1 through BIO MM 7), the probability of direct effects to condors due to collision with a tower or ingestion of microtrash at a proposed Project facility during construction or operations is highly unlikely because condors would not be inclined to visit the site due to lack of suitable perch sites. If condors would visit the site, any consequences are highly unlikely because the site would be cleared of microtrash that could be ingested by the birds. Also, it is highly unlikely that indirect effects due to the construction or operations of a communication tower placed at an existing facility or the temporary presence of on-site construction workers would contribute to habituation by condors to human structures and activity. Each proposed Project site is within or immediately adjacent to a previously developed facility, and the proposed developments would be consistent with current site usage and would not alter the nature of site impacts.

With implementation of mitigation measures BIO MM 1 through BIO MM 7 the proposed Project would result in less than significant construction or operational impacts to the California condor at sites BUR, BUR1, BUR2, BUR3, FRP, FTP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, SUN, SUN2, TMT, TPK, VPK, WMP, and WTR.

Coastal California Gnatcatcher

Coastal California gnatcatchers are typically found in stands of coastal sage scrub that have moderate shrub canopy cover, generally greater than 50 percent (Beyers and Wirtz 1997). The gnatcatcher tends to occur most frequently within sagebrush-dominated stands on mesas, gently sloping areas, and along the lower slopes of the coastal ranges. More than 80 percent of recorded sightings of coastal California gnatcatchers within the United States were reported to occur below an elevation of 820 feet (Atwood and Bolsinger 1992), with approximately 99 percent of reported occurrences at or below 984 feet in elevation (USFWS 2007a). Higher elevations may be used during dispersal, however.

The gnatcatcher defends breeding territories ranging in size from 2 to 14 acres. The home range size of the gnatcatcher varies seasonally and geographically, with winter season home ranges being larger than

breeding season ranges (Bontrager 1991) and inland populations having larger home ranges than coastal populations (Atwood and Bontrager 2001). The breeding season of the gnatcatcher generally extends from late February through July (sometimes later). Nests are composed of grasses, bark strips, small leaves, spider webs, down, and other materials and are often located in California sagebrush plants about 3 feet above the ground. The average clutch size is four eggs, and incubation takes about 14 days (USFWS 2007a). The gnatcatcher generally disperses short distances within contiguous and undisturbed habitat (USFWS 2010b). Juvenile gnatcatchers can disperse long distances (up to 14 miles) across fragmented and highly disturbed sage scrub habitat such as that found along highway and utility corridors (Bailey and Mock 1998; Famolaro and Newman 1998; Galvin 1998).

The primary threat to coastal California gnatcatchers is the loss and fragmentation of habitat, which includes not only loss of the coastal sage scrub vegetation community where the birds nest, but also loss of non-sage scrub habitats such as chaparral, grassland, and/or riparian areas, in proximity to the sage scrub habitats that provide space for dispersal, foraging, and nesting (USFWS 2007a). Noise has been implicated as a potential source of threats to coastal California gnatcatchers. Noise, vibrations, and other construction-related activities are temporary disturbances that have the potential to impact gnatcatchers. Noise above certain decibel (dB) levels can present a potential impact to the birds, whether from direct damage to hearing, masking of communication signals between birds, or response to predators. Different sound levels can produce different impacts when certain noise thresholds are exceeded. For instance, various studies on highway and construction noise show that continuous noise levels from above 110 A-weighted decibels (abbreviated dBA, A-weighted decibels express the relative loudness of sounds in air as perceived by the human ear by correcting for audio frequency by reducing the values of sounds at low frequencies for which the human ear is less sensitive than high frequencies) sound pressure level (SPL) or a single noise blast over 140 dB SPL (125 dBA SPL for multiple blasts) will likely result in damage to some birds. At a distance from the highway or construction area where noise drops to below 110 dBA, SPL continuous exposure, hearing loss, and permanent hearing sensitivity modifications are unlikely (Dooling and Popper 2007).

Bird response to noise has been shown to be different than human response. Within the average auditory spectrum for bird hearing and vocalization (between 2 kilohertz and 4 kilohertz), the equivalent spectrum noise level is approximately 6 dBs higher relative to background noise for birds compared to human response (Dooling and Popper 2007). The 6-dB difference means that a human can still detect a point source of sound at twice the distance the typical bird can against a background of noise. Therefore, using the dBAs provides a conservative standard of comparison for potential impacts.

Of the seven proposed Project sites that have been identified to provide potentially suitable habitat for the coastal California gnatcatcher within 500 feet of the site, gnatcatchers are known to nest in the vicinity of one site (RIH). Protocol surveys for gnatcatchers were conducted in 2014 at three sites (H-17A, LEPS, and PWT), but no birds were detected. Habitat within the vicinity of these and the other proposed Project sites is considered potentially suitable for nesting, offering from marginal (e.g., PWT

and SDW) to very good conditions (H-17A); Site VPK provides dispersal habitat (i.e., not suitable for nesting).

Construction Impacts

Impacts to the coastal California gnatcatcher due to construction activities would occur from a loss of coastal sage scrub habitat, temporary disturbance to nesting birds at construction sites and along access roads, disturbance to foraging birds, and disturbance to dispersing birds (outside the breeding season). Though construction activities at most Project sites is limited to areas of pre-existing disturbance and would not result in the loss of native perennial shrubs, some Project plans (e.g., H-17A) identify a potential construction footprint that could result in loss of one to several individual shrubs. Even minor habitat loss, depending on the circumstances, could increase fragmentation of habitat patches already separated by roads and possibly increase exposure to predation. CDFW has established a 500-foot protection zone around active nests of special status species of birds.

Construction activities at proposed Project sites would result in noise that could cause disturbance to gnatcatchers that may be nesting in or near the study area if construction activities are conducted during the breeding season. And, since gnatcatchers are present year-round, construction activities at any time could disturb birds. Noise from demolition of existing pavement and structures, including concrete cutting, was determined to result in the highest one-hour average noise exposure. The one-hour average exposure (equivalent continuous noise level; an average of noise events) at 50 feet from the assumed location of the construction activity would be approximately 90 dBA for concrete cutting activities. The second noisiest construction activity, excavation and soil handling for tower foundations, may take more than one day; therefore, it would have a greater potential for annoyance to sensitive species. The one-hour average exposure at 50 feet from the assumed location of the activity would be approximately 81 dBA. Ambient noise levels vary depending on a site's setting, with levels for rural sites typically ranging from 45 to 55 dBA. At sites considered an urban fringe/rural/remote area, the "soft" ground surfaces absorb a substantial amount of noise energy.

The Federal Highway Administration (FHWA) Roadway Construction Noise Model v.1.1 (FHWA 2008) was used to calculate potential noise exposures for coastal California gnatcatchers from construction activity and incorporates the 50-foot reference levels for concrete cutting, excavation, and soil handling activities. Construction activities would occur over a period of about six weeks, with the loudest noises generated over a period of up to a few days. At a distance of 500 feet (the distance of the required disturbance buffer for nesting special status birds) and greater, the predicted noise levels are at or below ambient levels (45 to 50 dBA) and below noise thresholds that typically impact bird species.

Temporary disturbance due to construction activities (e.g., construction vehicle access, presence of people, concrete cutting, boring for geotechnical investigations, trenching, concrete pouring, use of large equipment such as cranes, and other sources of loud noises and activities) during the breeding season (February 1 through August 30) could disrupt gnatcatchers if they are nesting or foraging near

the Project site or along access roads. If these disturbances persist or are at extreme levels, nests could be abandoned.

At three proposed Project sites: H-17A, PHN, and RIH, suitable gnatcatcher nesting habitat is located in close proximity to or within the construction zone; birds are known to nest in the vicinity of Site RIH. Some sage scrub vegetation may be lost due to construction, and construction during the breeding season may result in nest abandonment if birds nest nearby.

Proposed Project sites LEPS and PWT provided apparent high quality habitat, though no observations of the gnatcatcher are recorded within 3 miles. This general area of Los Angeles County is not known to support high numbers of breeding gnatcatchers. Due to the extent of the surrounding habitat, it is possible that gnatcatchers could colonize the area, or territories of birds from outside the boundaries of the study area could overlap with the study area. In either case, gnatcatchers could be disturbed by Project-related activities, especially during the nesting season.

Proposed Project sites SDW and VPK have limited sage scrub vegetation that is generally unsuitable for gnatcatcher nesting (e.g., patch size too small; slopes too steep), although gnatcatchers may forage or disperse through these study areas.

Impacts to coastal California gnatcatchers from proposed Project construction would be significant at sites H-17A, LEPS, PHN, PWT, and RIH.

Impacts to coastal California gnatcatchers from proposed Project construction would be less than significant at sites SDW and VPK.

Operational Impacts

The noise associated with normal operations and maintenance activities would include routine site inspections and use of access roads (approximately one visit per month), weed management, occasional equipment repairs, and monthly running of the backup generator. Emergency diesel generators (35 kilowatts to 100 kilowatts) would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. The diesel generators used for the proposed Project are assumed to have a noise rating of 58 dBA at 21 feet, which is below 60 dBA and would be considered “normally acceptable” for outdoor residential (human) exposure. Noise from the generators would rapidly attenuate with distance to about ambient levels.

Impacts to coastal California gnatcatcher from proposed Project operations would be less than significant at Sites H-17A, LEPS, PHN, PWT, RIH, SDW, and VPK.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that provide potentially suitable habitat for the California gnatcatcher (see Table 3.3-7) (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 8 Biological Monitoring

A qualified biological monitor shall be present at the site during construction activities that result in ground disturbance or removal of vegetation to ensure all mitigation measures are met. Duties of the biological monitor include checking for the presence of wildlife on the construction site, inspecting trenches or holes for trapped wildlife, surveying for the presence of nesting birds and adherence to nesting bird protection buffers, monitoring construction site boundaries, and checking that vegetation flagged for protection is not disturbed.

BIO MM 9 Protect Native Vegetation and Common Wildlife

- a) Minimize disturbance to native perennial plants; new ground disturbance shall be the minimum necessary and established and delineated prior to any earth-moving activities.
- b) If native perennial vegetation cannot be avoided and would be impacted or destroyed, the disturbance area is to be surveyed for the presence of special status plants and to remove common species of wildlife prior to destruction of the vegetation.
- c) At no time shall protected species be handled or moved. If a protected species is found within the construction area, all work that may impact that animal shall cease and the appropriate agency(s) shall be contacted (e.g., USFWS, CDFW, land management agency). The animal shall be allowed to leave the site on its own accord.
- d) Prior to construction or any ground-disturbance activities, mark the construction disturbance limits and monitor for adherence to these boundaries.
- e) Stay on existing roads.
- f) Do not remove native trees; construction limits shall be established to avoid walnuts, oaks, and any other sensitive species habitat and the limits shall be flagged by a biological monitor.
- g) Protect tree root systems by precluding paving, trenching, or other ground disturbing activities; and preclude heavy equipment from driving, parking, or staging within the tree's dripline.

- h) Any loss of native perennial vegetation, whether planned or unintentional, is to be accounted for in reports prepared by the biological monitor.

BIO MM 10 No Pets

Construction and maintenance workers shall be prohibited from bringing pets (especially dogs) to non-urban Project sites, as the domestic animal may harass or kill native wildlife present at the site.

BIO MM 11 Site Access

- a) On access roads operate all vehicles within the posted speed limits.
- b) If access road speed limits are not posted, do not exceed 15 miles per hour (mph).
- c) Adjust vehicle speed as appropriate to road conditions; avoid causing ruts and gullies; and minimize dust.
- d) Watch for wildlife on roads (including amphibians, snakes, rodents, and tortoises), especially during rainy periods, and avoid running them over.
- e) Look under parked vehicles for the presence of wildlife (especially desert tortoise) before pulling away to avoid running over wildlife.
- f) Do not park on or drive over native perennial vegetation.
- g) Avoid cutting corners on access roads and impacting vegetation when large equipment and trailers are brought to the Project site.
- h) Do not drive off the designated roadway or make any modifications to the road or road shoulders.

BIO MM 12 Coastal California Gnatcatcher Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of coastal California gnatcatchers in the area and the importance of maintaining coastal sage scrub vegetation.
- b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially coastal sage scrub vegetation (e.g., California sagebrush, sage, laurel sumac, and California buckwheat), would be minimized. Surveys shall be conducted by a qualified biologist for the presence of coastal sage scrub perennial vegetation, and plants not identified for removal within or near the construction zone shall be marked for protection.

- c) As part of BIO MM 3 Biological Compliance Reporting, the environmental monitor shall verify at least once a week during active construction and upon completion of construction activities that habitat protection measures have been followed.
- d) At proposed Project sites H-17A, PHN, and RIH, a higher level of protection is required to ensure that gnatcatchers are not present when construction activities would occur and adverse effects would be avoided. For proposed Project sites that include known or suspected gnatcatcher nesting or otherwise include suitable nesting habitat where the bird is expected to be present, the following mitigation measure is to ensure the highest level of protection to the bird. All the above measures (BIO MM 1 through BIO MM 3, and BIO MM 8 through BIO MM 12) apply as well as:

BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions

Construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation shall be precluded between February 15 and August 30. This measure is applicable to identified Project sites where coastal California gnatcatchers are known to be or likely would be present, and construction activities may result in disturbance to the bird.

At proposed Project sites LEPS and PWT, protocol surveys may be conducted to determine that nesting gnatcatchers are not present, or BIO MM 13 would apply. If nesting gnatcatchers are located, a 500-foot protection buffer would be required. The above measures (BIO MM 1 through BIO MM 3 and BIO MM 8 through BIO MM 12) apply as well as:

BIO MM 14 Coastal California Gnatcatcher Protocol Surveys

- a) To determine if coastal California gnatcatchers are present within 500 feet of specified Project sites and if breeding season restrictions would be required, surveys following the most recent version of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol (current revision issued by USFWS Carlsbad Office 1997) shall be conducted prior to initiating any construction activities that may result in ground disturbance or loud noises during the gnatcatcher breeding season (February 15 through August 30). This protocol requires call-playback surveys by a permitted biologist, conducting a minimum of six surveys at least one week apart between March 15 and June 30 (additional survey requirements are presented in the protocol).
- b) If adult, nesting, or fledgling gnatcatchers are detected even once within 500 feet of the proposed Project site, or if surveys are not completed in compliance with the protocol, BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions

shall apply to the site, precluding any construction activities that include loud noises (e.g., trenching, drilling, concrete cutting), the use of large equipment (e.g., booms, cranes, drills, concrete pouring), or the removal of perennial vegetation between February 15 and August 30.

- c) If no adult, nesting, or fledgling gnatcatchers are detected within 500 feet of the proposed Project site, construction activities may commence beginning July 1 through February 14.
- d) Survey requirements shall be applied each year that construction activities take place at the Project site.

Impacts after Mitigation

Implementation of mitigation measures BIO MM 1 through BIO MM 3 and BIO MM 8 through BIO MM 12 shall apply to each of the seven proposed Project sites where potentially suitable coastal California gnatcatcher habitat is present within each applicable study area. Though impacts to gnatcatchers at proposed Project sites SDW and VPK would be less than significant without application of mitigation measures, these measures would still apply at these sites regardless of the level of significance and would further reduce the already less than significant impacts. Disturbance due to construction activities would be precluded at the most sensitive sites (i.e., H-17A, PHN, RIH) by restricting these activities during the gnatcatcher nesting season (February 15 through August 30) (BIO MM 13), or requiring preconstruction surveys (BIO MM 14) at proposed Project sites LEPS and PWT. Most native perennial vegetation would be preserved on site (BIO MM 9 and BIO MM 11); however, there would likely be some individual plants at proposed Project sites or along access roads that cannot be avoided and must be trimmed or removed to accommodate Project needs. If this would occur, the impacted vegetation would likely be limited to a few plants at the periphery of developed sites or along roads; therefore, maintaining the integrity of suitable habitat and would not cause an otherwise suitable habitat patch to become unsuitable. The worker environmental awareness program (BIO MM 2) and presence of an on-site environmental monitor (BIO MM 8) would safeguard against mistakes.

Implementation of mitigation measures BIO MM 1 through BIO MM 3 and BIO MM 8 through BIO MM 12 at proposed Project sites SDW and VPK would further reduce the less than significant impacts related to the construction and operations of the proposed Project to the coastal California gnatcatcher.

Implementation of mitigation measures BIO MM 1 through BIO MM 3 and BIO MM 8 through BIO MM 13 at proposed Project sites H-17A, PHN, and RIH would result in less than significant construction or operational impacts to the coastal California gnatcatcher.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8 through BIO MM 12, and BIO MM 14 at proposed Project sites LEPS and PWT the proposed Project would result in less than significant construction or operational impacts to the coastal California gnatcatcher.

Southwestern Willow Flycatcher

The southwestern willow flycatcher is migratory, arriving in breeding territories by mid-May and then migrating to southern wintering grounds in August and September. It is an obligate riparian nesting bird, typically in association with dense, riparian vegetation that may include high proportions of nonnative salt cedar trees. Current threats to southwestern willow flycatchers include loss of riparian habitat, alteration in stream hydrology (e.g., water withdrawal, impoundments), reservoir management, and brood parasitism by brown-headed cowbirds.

Potentially suitable flycatcher habitat is found within the study area of a single proposed Project site, Site LACFCP11 (see Table 3.3-7). This site is on a low ridgeline above Soledad Canyon Road on the opposite side of the road within the study area of Site LACFCP11, in the floodplain of the Santa Clara River. Primary vegetation within the Santa Clara River corridor is mature riparian forest that includes coast live oak and California sycamore trees, though the stream is not perennial in this portion of the drainage. The river corridor has been highly impacted by heavy equipment, dumping or storage of construction materials, and as a source of water for helicopter bucket dips from a maintained water storage tank; on the opposite side of the river corridor from the Project site is an active railroad line. It is unknown if southwestern willow flycatchers currently utilize the riparian corridor near Site LACFCP11; one southwestern willow flycatcher was observed in 1997 approximately 1 mile west of the study area directly adjacent to the Santa Clara River, but no sightings have been reported since. The next closest flycatcher sighting was reported approximately 35 miles downstream. The riparian habitat within the study area is low quality at best and does not provide suitable nesting habitat due to lack of permanent or semi-permanent water and lack of large patches of dense riparian vegetation with complex vertical structure (though habitat quality may change year to year). Suitable foraging habitat may be present in the study area, but suitable nesting habitat is not.

Construction Impacts

No riparian vegetation is expected to be impacted, and no Project-related activities would occur in the Santa Clara River floodplain; no loss of southwestern willow flycatcher habitat would occur. A potential impact may be a temporary increase in noise during construction of a new monopole; however, nesting flycatchers are not expected to be present, and foraging birds would likely be accustomed to noises due to elevated ambient noise levels associated with highway traffic on Soledad Canyon Road, the railroad line, and helipad on the proposed Project site.

Impacts to the southwestern willow flycatcher from proposed Project construction would be less than significant at Site LACFCP11.

Operational Impact

The noise associated with normal operations and maintenance activities would include routine site inspections and use of access roads (approximately one visit per month), occasional equipment repairs, and monthly running of the backup generator. Emergency diesel generators (35 kilowatts to 100 kilowatts) would operate one hour per month as part of routine maintenance and would operate to

provide backup power in the event of a power outage. The emergency generators would be housed by solid walls, with the resulting noise emissions at 58 dBA at 21 feet. Noise from the generators would rapidly attenuate to about ambient levels. Ongoing operations of the proposed Project site would not result in the loss of riparian vegetation.

No impacts to the southwestern willow flycatcher would result from operations of the proposed Project at Site LACFCP11.

Mitigation Measures

Though impacts to the southwestern willow flycatcher at proposed Project Site LACFCP11 would be less than significant without application of mitigation measures, the following measures would still apply at Site LACFCP11 regardless of the level of significance and would further reduce the already less than significant impacts. The following mitigation measures would be implemented at Site LACFCP11 for the southwestern willow flycatcher (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 8 Biological Monitoring

BIO MM 9 Protect Native Vegetation and Common Wildlife

BIO MM 15 Southwestern Willow Flycatcher Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of southwestern willow flycatchers in the area and the importance of maintaining riparian vegetation.
- b) As part of BIO MM 9 Protect Native Vegetation and Common Wildlife, disturbance to native perennial vegetation, especially riparian species (e.g., sycamore, cottonwood, willow), would be minimized; no ground-disturbing activities or removal of vegetation would occur within stream corridors or floodplains. Prior to construction, surveys for the presence of riparian vegetation shall be conducted by a qualified biologist, and those plants within or near the construction zone not identified for removal shall be marked for protection and monitored for adherence to these boundaries.

Impacts after Mitigation

The proposed development of Site LACFCP11, with the implementation of required mitigation measures (BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, and BIO MM 15) would ensure that there would be no loss of riparian habitat.

Implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, and BIO MM 15 at Site LACFCP11 would further reduce the less than significant construction and operational impacts of implementation of the proposed Project on the southwestern willow flycatcher.

Western Snowy Plover

Western snowy plover nests above the high tide line on coastal beaches, sand spits, dune-backed beaches, sparsely vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. The breeding season is typically from March 1 through September 30. In winter, western snowy plovers may be more widespread, and they may be found on beaches where they do not currently nest. Habitat degradation and loss, disturbance due to human activity, and expanding predator populations (e.g., ravens, gulls, and dogs) have resulted in a decline in nesting birds. The nesting season of the western snowy plover (March through September) coincides with the period of greatest human use (Memorial Day through Labor Day) on beaches of the west coast. Intensive beach use by humans may result in abandonment of nest sites, reductions in nest density, and reductions in nesting success (USFWS 2014a).

Proposed Project Site ZHQ is located at the Zuma Beach lifeguard station within a paved parking lot between the Pacific Coast Highway and the beach. Western snowy plover critical habitat has been designated along the beach within the study area of and adjacent to Site ZHQ. The beach is highly managed (e.g., sand bulldozed and piled) and is a focal area for recreationists, whose presence would preclude nesting by the plover on the beach in the vicinity of Site ZHQ outside protected areas; however, conditions and nesting sites may change year to year. The critical habitat unit extends 3 miles along the coast and is considered occupied and an important wintering area. Paved areas and the land on which structures have been built are excluded from critical habitat (USFWS 2012a).

Construction Impacts

Since site development is limited to the paved parking area, no beach habitat would be removed from western snowy plover habitat due to Project activities. The construction site is in close proximity to designated critical habitat; and, though disturbance associated with construction may be assimilated into the background noise from surf, traffic, and recreationists, Project activities could disturb the birds if they are present nearby.

Temporary disturbance due to construction activities (e.g., construction vehicle access, presence of people, concrete cutting, boring for geotechnical investigations, concrete pouring, use of large equipment such as cranes, and other sources of loud noises and activities) during the breeding season (March 1 through September 30) could disrupt plovers if they are nesting or foraging near the Project site; however, the area is heavily used for recreation during the high season (mid-May through August), so these additional disturbances associated with construction of a new 35-foot tall monopole would not be expected to result in excessive noise levels, potentially causing nest abandonment.

When construction activities are conducted outside the nesting period, the temporary increase in noise could potentially disrupt wintering western snowy plovers if individuals utilize or move through the

study area. During the non-breeding season, however, the birds may more broadly disperse and use sand dunes up and down the beach. Birds can react to temporary disturbances while maintaining normal behavior patterns; however, even minor disturbances may cause a bird to temporarily avoid the area.

Impacts to western snowy plover from construction at proposed Project Site ZHQ would be significant.

Operational Impacts

Predation is a constant threat to western snowy plovers, and the tower may provide perch sites for potential predators such as gulls and ravens to observe the area and locate plovers, their young, or eggs to feed on. With the high level of use in this area by recreationists, plovers have a reduced likelihood to nest nearby, though predatory birds have excellent eyesight and may observe to great distances from an elevated perch. Snowy plovers at Project Site ZHQ may be more vulnerable to predation by predators perching on the monopole during winter when humans are less active at the beach and plovers may use more of the beach.

The noise from maintenance activities, which would include routine site inspections, generator testing, and occasional equipment repairs, would not be substantially different from current levels at Site ZHQ (the site is adjacent to the Pacific Coast Highway and helicopter landing pad).

Impacts to western snowy plover from operations at proposed Project Site ZHQ would be significant.

Mitigation Measures

The following mitigation measures would be required at Site ZHQ for the western snowy plover (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 6 Anti-perch Devices

BIO MM 8 Biological Monitoring

BIO MM 10 No Pets

BIO MM 16 Snowy Plover Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of western snowy plover in the area and the importance of not disturbing nesting birds.

- b) If construction occurs between February 1 and July 31, prior to beginning construction a biological monitor shall verify through coordination with USFWS and on-site surveys that no breeding western snowy plovers are using the Project site or are within 500 feet of any Project activity.
- c) If plovers are nesting in the vicinity, BIO MM 8 Biological Monitoring would apply, and a 500-foot protection buffer shall be required where no construction activities may occur while birds remain in the area.

Impacts after Mitigation

The proposed development of Site ZHQ, with the implementation of required mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, BIO MM 10, and BIO MM 16 would avoid or reduce potential effects to the western snowy plover to the level of insignificant. No beach habitat would be lost. If nesting birds could be present, a protection buffer would be applied (BIO MM 16). Potential disturbance to wintering birds would be assimilated into their normal behavior patterns as they can disperse over expansive areas of the beach. The presence of the monopole would not facilitate avian predation on plovers since perching on the tower would be discouraged by the placement of anti-perch devices (BIO MM 6).

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, BIO MM 10, and BIO MM 16 at Site ZHQ the proposed Project would result in less than significant construction or operational impacts to the western snowy plover.

Raptors: American Peregrine Falcon, Bald Eagle, Golden Eagle, Long-eared Owl, Burrowing Owl

Raptors are wide-ranging predatory birds that require large expanses of open space to forage; they generally nest in remote locations and may be easily disturbed by human presence, especially around nest sites. CDFW often establishes a 500-foot buffer around active raptor nests for protection from disturbance, and even larger buffers for eagles. The American peregrine falcon feeds on other birds and typically nests on steep cliffs but has adapted to nesting on ledges of tall high-rise buildings. Bald eagles usually nest on cliffs or large trees near water where they feed on fish, waterfowl, sea birds, and carrion. Golden eagle nesting habitat includes rocky crags and cliffs, and it forages in open habitats (e.g., grasslands, open shrublands), feeding on rabbits, ground squirrels, and carrion. The long-eared owl forages during the night on rodents and nests in large trees. The burrowing owl is often active during the day and frequently is found in highly disturbed and open habitats.

Due to the wide-ranging nature of these raptors, occurrence data on bald and golden eagles within 10 miles of proposed Project sites were reviewed; and on-site evaluation of habitat suitability was not limited to only those raptors recorded in the general vicinity. Each study area of each proposed Project site was considered for both nesting and foraging habitat for these species

Of the 16 proposed Project sites where suitable peregrine falcon foraging habitat is present in the surrounding area, suitable nesting habitat does not occur within the study area. Cliff-face nesting habitat

may be found within 1 mile of eight proposed Project sites, including the three proposed sites on Santa Catalina Island. During 2004, only a single peregrine nest was known on the island, but several other adult pairs were observed (Predatory Bird Research Group 2004). The current status is unclear, but apparently little change has occurred. Additional consideration was provided for peregrine falcons on Santa Catalina Island due to the steep topography of the island and the possibility that other pairs may be nesting.

For the bald eagle, three of the four proposed Project sites that include bald eagle foraging habitat are on Santa Catalina Island. As of 2014, eight recognized bald eagle breeding territories are on Santa Catalina Island (Sharpe 2015). These three Project sites are between 0.5 mile and 1 mile from eagle breeding territories (not the actual nest sites). Bald eagles are also recorded from the general vicinity of Site GMT, which is about 2 miles from eagle-use areas at Lake Elizabeth.

Foraging habitat for golden eagles occurs within the study area of eight proposed Project sites, but none of the sites include steep cliffs and rocky crags used as nest sites within or in proximity to these study areas. Study areas on Catalina Island are not included for consideration of golden eagles because no golden eagles have been seen on the island since the mid-1980s (Catalina Island Conservancy 2015).

The long-eared owl is recorded from the vicinity of Site AJT. This site is a rural/urban interface with controlled human access. Suitable foraging and nesting habitat of the owl may be present within the study area of Site AJT, with potential nesting habitat associated with stands of California black walnut trees.

The burrowing owl was recorded about 0.2 mile west of the proposed Project Site H-17A along Skyline/Fire Ridge Road. The bird was using the cleared firebreak along the road following the ridge. Similar and contiguous habitat is found within Site H-17A and its study area.

Construction Impacts

During construction, temporary (about six weeks) human activity may result in increases in noise, dust, and human presence; all of these would disrupt nesting and foraging behavior of the peregrine falcon, bald eagle, golden eagle, and long-eared owl, if birds are sufficiently close to these activities. This is particularly the case during breeding season if these birds nest within line of sight at almost any distance of a proposed construction site. Based on current data and field review, no nests or nesting habitat for the falcon or eagles are known within any of the study areas; but these birds are very sensitive to human presence, and nesting habitat may occur in the vicinity of some study areas. Long-eared owls could establish a nest within the study area of Site AJT, and it is expected that burrowing owls are nesting in or near the study area of Site H-17A.

Raptors generally have very large home ranges and forage widely, so birds would act within their normal behavior patterns to avoid any localized temporary disturbance. Construction impacts at proposed Project sites due to lost foraging opportunities for peregrine falcon, bald eagle, golden eagle, and long-eared owl would be less than significant.

Burrowing owls typically remain in the vicinity of their burrows and would be more susceptible to disturbance or destruction; impacts to burrowing owl from construction at proposed Project Site H-17A would be significant.

Construction activities would result in significant impacts to nesting peregrine falcon, bald eagle, golden eagle, and long-eared owl at sites AGH, AJT, BJM, CPK, DPK, ENC1, ENT, FTP, GMT, H-17A, H-69B, JOP, LACFCP08, MTL2, OAT, PWT, SPN, TOP, TPK, TWR, VPK, and WTR.

Operational Impacts

When construction of proposed Project facilities is completed at sites that peregrine falcons, bald eagles, golden eagles, long-eared owls, or burrowing owls may pass in flight, no fundamental change would occur to the nature of existing site impacts because these sites currently have some level of development and occasional human presence. The noise associated with normal operations and maintenance activities would include routine site inspections and use of access roads (approximately one visit per month), occasional equipment repairs, and monthly running of the backup generator. Noise from the generators would rapidly attenuate to about ambient levels.

No operational impacts are anticipated to peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl at sites AGH, AJT, BJM, CPK, DPK, ENC1, ENT, FTP, GMT, H-17A, H-69B, JOP, LACFCP08, MTL2, OAT, PWT, SPN, TOP, TPK, TWR, VPK, and WTR.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that provide potentially suitable habitat for these raptor species (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 8 Biological Monitoring

BIO MM 17 Raptor Protection

- a) If construction activities occur during the American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl breeding period, January 1 through July 31, preconstruction surveys would be conducted in all suitable habitats within 500 feet of the Project site as well as within a species-appropriate distance beyond the 500-foot buffer based on line of sight between potential nesting habitat and the construction site.

- b) If construction takes place during the breeding period, the biological monitor shall contact appropriate land management and resource agencies to ascertain if they have any current information on raptor nesting activities in the general vicinity of the proposed Project sites.
- c) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered within 500 feet of the construction site, work shall not be undertaken at that site until the nest is no longer active, with an additional five days to allow the fledging birds to disperse. An active nest is defined as one that is attended, built, maintained, or used by a pair of birds during a given breeding season, whether or not eggs are laid; a nest is considered inactive if not attended to for a period of 10 days or longer.
- d) If an active American peregrine falcon, bald eagle, golden eagle, long-eared owl, or burrowing owl nest is discovered between 500 feet and 0.5 mile of the construction site, the potential for disturbance of the nesting birds would be evaluated based on line-of-sight, degree of potentially disturbing activities, and other site-specific factors. If the CDFW and land management agency concur, the protection buffer distance may be reduced.

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, and BIO MM 17, the possibility of disturbance to nesting American peregrine falcons, bald eagles, golden eagles, long-eared owls, or burrowing owls would preclude any potential for nest abandonment or other negative impacts to these species.

Implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, and BIO MM 17, would result in less than significant construction or operational impacts to the American peregrine falcon, bald eagle, golden eagle, long-eared owl, and burrowing owl at sites AGH, AJT, BJM, CPK, DPK, ENC1, ENT, FTP, GMT, H-17A, H-69B, JOP, LACFCP08, MTL2, OAT, PWT, SPN, TOP, TPK, TWR, VPK, and WTR.

Migratory Birds

Various species of migratory birds, including raptors, may nest at or in close proximity to proposed Project construction sites. The vast majority of native birds and their nests and young are protected under the Migratory Bird Treaty Act (16 U.S.C. 703– 712); and FGC Sections 3503 and 3503.5 protect birds and nests, and Section 3513 provides for consistency with the Migratory Bird Treaty Act (see Section 3.3.2.1 Migratory Birds), which makes it illegal to destroy any active migratory bird nest. Protected birds may nest in a wide variety of locations, including trees, shrubs, on the ground, and on human-made structures (e.g., buildings, bridges, water tanks, antenna towers). Nesting birds may be found in pristine native habitats, in highly degraded habitat remnants, within landscaped and ornamental plantings, and in ruderal settings.

Project construction activities at some sites may include vegetation removal, which could result in the direct loss of nests, eggs, and/or young. The noise and human presence associated with construction during the breeding season has the potential to disturb nesting birds throughout the Project vicinity and result in a loss of productivity (i.e., reduced number of young raised) due to disruption of foraging activities and care of nestlings by the parent birds, or otherwise lead to the abandonment of nests. The degree of sensitivity to disturbances varies greatly species-by-species and pair-by-pair within a species and is influenced by the stage of the nesting cycle (e.g., nest building, egg laying, age of young). Generally, raptors are the most sensitive to human presence in the vicinity of their nests.

CDFW has provided Project-specific guidelines to protect migratory birds and to avoid disturbance to nests (correspondence to Ms. Nancy Yang, LA-RICS from Ms. Betty Courtney, CDFW, September 23, 2014). If construction and vegetation removal must occur during the nesting season (March 1 through September 15, and January 1 through July 31 for raptors), a minimum protection buffer of 300 feet shall be established and marked in the field around non-raptor nests, and a 500-foot buffer shall be established around raptor and other special status bird species nests; additional buffers may apply to fully protect species such as nesting California condors and eagles. These buffers shall remain in place until the young would no longer be impacted by Project activities. CDFW also allows for the development of a project-specific nesting bird management plan that may propose an alternative method for protecting nesting birds based on site-specific conditions and project activities.

The American Bird Conservancy reports an estimated 6.8 million birds annually are killed by collision with communication towers in the United States and Canada (Longcore et al. 2012). The Department of Interior Office of the Secretary (2014) reports that impacts from non-ionizing electromagnetic radiation emitted by communication towers could be significant for birds, and that cell tower radiation could be a threat to nearby nesting birds. To address these concerns, the USFWS Office of Migratory Birds has issued voluntary guidelines (USFWS 2013a) for communications tower placement, construction, and operation. The guidelines emphasize collocation wherever possible to reduce the total number of towers, and recommend that structures are either a lattice tower or monopole design, that towers be no more than 199 feet above ground level, that construction techniques should not require guy wires (even if a larger footprint is required), that towers are unlighted if FAA regulations permit, and that security lighting is down-shielded and does not exceed the minimum intensity needed. Other considerations include that towers are to be sited to avoid migratory pathways and other bird concentration areas to minimize the loss of habitat, and to consider the presence of state and federally listed species.

Construction Impacts

Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the FGC Sections 3503 and 3503.5 would occur if nesting birds are present as a result of vegetation removal or other on-site construction activities if these activities occur during active nesting season, generally March 1 through September 15 for non-raptors and January 1 through July 31 for raptors. Depending on the type of construction activities and equipment in use, amount of noise, degree

of human presence, and species of bird present, construction activities would result in temporary disturbance to birds attending a nest, increased susceptibility of birds and their nests to predation, nest abandonment, or the direct destruction of nests. Sites ASD, LARICSHQ, PDC, SIM, and WS1 do not provide habitat for nesting birds. Site ASD is in a highly disturbed setting without ornamental vegetation. Sites LARICSHQ, PDC, SIM, and WS1 are roof mounts.

Impacts to migratory birds from proposed Project construction would be significant at all proposed Project sites except sites ASD, LARICSHQ, PDC, SIM, and WS1.

Operational Impacts

The proposed Project tower design complies with the voluntary guidelines for communications towers established by the USFWS Office of Migratory Birds at all sites with the exception of proposed Project Site DPK on Santa Catalina Island, where a new 215-foot tall lattice tower would be constructed (USFWS guidelines limit tower heights to no more than 199 feet). Towers of this height are required by the FAA to be lit, which creates an additional hazard to migratory birds. In keeping with the priority for collocation on existing structures, some antennas would be collocated on guyed towers. Protected native birds may collide with towers, especially to towers with lighting; and birds may be exposed to some level of electromagnetic radiation if they nest or habitually perch close to the antennas. Monopole structures and their associated antennas are shorter in height and ultimately more visible to birds than their lattice tower counterparts and, thus, are more avoidable. While standing monopoles still pose some level of threat to birds in flight, the threat is greater from lattice tower structures.

There would be no impacts to migratory birds from proposed Project operations at sites ASD, LARICSHQ, PDC, SIM, and WS1 due to lack of habitat (Site ASD) and collocation on rooftops (sites LARICSHQ, PDC, SIM, and WS1).

Impacts to migratory birds from proposed Project operations would be less than significant at the following proposed Project sites with monopole structures: AGH, AJT, ENT, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, PASPD01, PWT, SGH, WAD, and ZHQ.

Impacts to migratory birds from proposed Project operations would be significant at the following proposed Project sites with lattice tower structures: BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, MMC, MML, MTL2, OAT, PHN, PMT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WMP, and WTR.

Mitigation Measures

The following mitigation measures would be required at all proposed Project sites (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 6 Anti-perch Devices (selected sites)

BIO MM 8 Biological Monitoring

BIO MM 18 Nesting Bird Protection

- a) It is preferred that removal of trees or large tree limbs and other vegetation removal activities such as grubbing or shrub clearing avoid the typical bird nesting season of January 1 through September 15.
- b) If construction activities occur during the bird nesting season, and to prevent disturbance to or destruction of nests of protected native bird species that could occur as a result of vegetation removal, disturbance, or other on-site construction activities, preconstruction surveys for nesting birds shall be conducted by a qualified biological monitor within 10 calendar days prior to on-site construction-related disturbance activities from March 1 through September 15 for non-raptors, and January 1 through July 31 for raptors.
- c) If nesting protected non-raptor species are detected, a 300-foot avoidance buffer shall be implemented; a 500-foot avoidance buffer would be applied to any active nest of a raptor or other species of special status bird.
- d) Appropriate site-specific buffers may be established with the approval of a project designated avian expert, based in part on the species of nesting bird present, location of nest, nesting phenology, magnitude of potential disturbance, and other site conditions (e.g., levels of ambient noise; line-of-sight).
- e) If construction activities would occur within the general buffer distances for active nests (300 feet for non-raptors, 500 feet for raptors, and up to 1.5 miles for condors and eagles), a Biological Monitor must be present during those activities.
- f) No active nests may be destroyed; inactive bird nests may be destroyed as part of vegetation removal but may not be reduced to possession.
- g) Between September 16 and December 30, grubbing, shrub clearing, and tree/limb removal activities are not subject to restrictions based on the protection of migratory birds.
- h) Comply with the USFWS Office of Migratory Birds voluntary guidelines (USFWS 2013a) for communications tower placement, construction, and operation.

- i) For any towers that must exceed 199 feet in height, lighting requirements would be designed in cooperation with FAA and USFWS Office of Migratory Birds to minimize attraction and resulting mortality of migratory birds.

Impacts after Mitigation

Preconstruction surveys for nesting migratory birds would be conducted if construction occurs during the nesting season (generally January 1 through September 15) and protection buffers would be established around active nests (BIO MM 18). An environmental monitor (BIO MM 8) is to be present at each site to identify and address any site-specific concern regarding nesting birds, as applicable. In addition to meeting the voluntary guidelines for communication towers, as established by the USFWS Office of Migratory Birds, anti-perch devices (BIO MM 6) would be installed at specific sites identified on a species-by-species basis (e.g., see California condor) to discourage perching and nesting on tower structures. Compliance with the USFWS voluntary guidelines for communication towers may not preclude all bird mortality due to collision with communication towers at proposed Project sites but is expected to greatly minimize this impact.

There would be no impacts to migratory birds from the proposed Project at sites ASD, LARICSHQ, PDC, SIM, and WS1 and no mitigation measures are required.

Implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, and BIO MM 18 would result in less than significant impacts to migratory birds due to construction activities at all proposed Project sites (with the exception of sites with no impacts to migratory birds: ASD, LARICSHQ, PDC, SIM, and WS1).

Impacts to migratory birds from proposed Project operations would be less than significant at the following proposed Project sites with monopole structures: AGH, AJT, ENT, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, PASPD01, PWT, SGH, WAD, and ZHQ.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, and BIO MM 18, there is still some risk of collision by birds in flight during the operational life of the proposed Project. Compliance with the USFWS voluntary guidelines for communication towers is expected to greatly minimize this impact. Impacts to migratory birds from proposed Project operations would be less than significant at the following proposed Project sites with lattice tower structures: BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, MMC, MML, MTL2, OAT, PHN, PMT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WMP, and WTR.

Although site DPK exceeds the height recommendations of the USFWS guidelines for communications towers by 15 feet, these guidelines provide for exceptions when necessary and include other suggestions when lighting is required. The specific requirements at Site DPK would be determined through coordination with the FAA and USFWS Office of Migratory Birds (it is expected that regardless of the tower height at Site DPK, the FAA would likely require some lighting). With implementation of

mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, and BIO MM 18, impacts to migratory birds at Site DPK would be less than significant.

Santa Catalina Island Fox

The Santa Catalina Island fox typically is found in dense shrubby vegetation; however, it has been observed using all habitat types present on Santa Catalina Island and could be found anywhere on the island—grasslands, shrublands, coastal marshes, and forests. The fox is omnivorous, eating fruits, insects, birds, eggs, crabs, lizards, and small mammals. Individual foxes tend to move about rather than travel in packs. The fox is generally nocturnal, with peaks of activity at dawn and dusk; it is not intimidated by humans. Santa Catalina Island foxes give birth to young in simple dens, under shrubs, or in the sides of ravines (Laughrin 1973). Young are born from early to late April after a gestation period of approximately 50 to 53 days. Litter size ranges from one to five kits (Moore and Collins 1995).

Major threats to the fox have been canine distemper and predation by golden eagles; however, no golden eagles have been seen on the island since the mid-1980s (Catalina Island Conservancy 2015). Though none of the three proposed Project sites on Santa Catalina Island (BJM, DPK, and TWR) are within what may be considered preferred fox habitat, the area surrounding each of these three sites could be occupied by foxes.

Construction Impacts

The noise and activities associated with construction of proposed Project sites would result in temporary disturbance to fox dens or foraging foxes if present in the area of the Project site or associated access roads. In addition, foxes could seek cover among stockpiled construction equipment, under construction debris, or in trenches; being a small animal, a fox may seek refuge in very small spaces. Moving this equipment could result in death or injury of the fox due to crushing or vehicle collision. Any discarded food or other trash left by construction workers could attract foxes to Project sites, exposing animals to unhealthy food items and possibly contributing to habituation of foxes to humans.

Impacts to Santa Catalina Island fox from proposed Project construction would be significant at sites BJM, DPK, and TWR.

Operational Impacts

The presence of the Project facility, per se, would not result in impacts to Santa Catalina Island fox; and the occasional visit to the site by maintenance workers (generally once a month) would not alter the current level of human presence at the sites or otherwise change the nature of ongoing impacts. Emergency diesel generators would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. The noise would attenuate rapidly and would not be above the levels that the fox would encounter in other areas on the island that have human presence; however, if equipment, debris, trash, or discarded food were left on site, this could compromise foxes that may be present or could pass by the Project sites.

Impacts to Santa Catalina Island fox from proposed Project operations would be significant at sites BJM, DPK, and TWR.

Mitigation Measures

The following mitigation measures would be required at sites on Santa Catalina Island (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 4 Site Sanitation

BIO MM 5 Hazardous Materials Management

BIO MM 8 Biological Monitoring

BIO MM 9 Protect Native Vegetation and Common Wildlife

BIO MM 10 No Pets

BIO MM 11 Site Access

BIO MM 19 Trenches and Holes Management

- a) The contractor shall cover or backfill all trenches the same calendar day they are opened, where practicable.
- b) If trenches or holes cannot be closed the same day they are made, covers shall be firmly secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor.
- c) Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped common wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species (e.g., arroyo toad) at Project sites that require the presence of a biological monitor.
- d) If a protected wildlife species is present in the trench, the on-site Biological Monitor shall contact USFWS immediately, ensure the protected species is not in immediate danger, and wait for instruction by USFWS.

- e) Covered trenches and holes at sites where biological monitors are present are to be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day.
- f) In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized.
- g) Prior to trenching, the construction disturbance limits and monitor for adherence to these boundaries shall be marked.

BIO MM 20 Santa Catalina Island Fox Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of the Santa Catalina Island fox and the measures to be taken to avoid impacts to the fox.
- b) Prior to initiation of construction activities, the Project site plus a 250-foot buffer shall be inspected by a qualified biologist for the presence of Santa Catalina Island fox dens; if a den is located, no construction activities may be initiated and USFWS and CDFW shall be contacted.
- c) As part of the BIO MM 8 Biological Monitoring, the biological monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of foxes each day prior to initiation of on-site work. Construction equipment that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) shall be inspected prior to moving.

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 5, BIO MM 8 through BIO MM 11, BIO MM 19, and BIO MM 20, construction and operational personnel would be aware of the possible presence of a fox and would avoid actions that could result in impacts to the fox (BIO MM 2). The sites would be maintained in clean condition (BIO MM 4 and BIO MM 5); equipment would be inspected for the presence of the animal prior to moving (BIO MM 8 and BIO MM 20); and trenches would be covered and inspected (BIO MM 19). Therefore, the development of the proposed Project sites would not have a substantial adverse effect, either directly or through habitat modifications, to the Santa Catalina Island fox.

With implementation of mitigation measures BIO MM 1 through BIO MM 5, BIO MM 8 through BIO MM 11, BIO MM 19, and BIO MM 20 the proposed Project would result in less than significant construction or operational impacts to the Santa Catalina Island fox at sites BJM, DPK, and TWR.

Small Animals: California Mountain Kingsnake, Coast Horned Lizard, San Diego Woodrat, Tehachapi Pocket Mouse, Townsend's Big-eared Bat, and Western Mastiff Bat

Each of these six species occurs in different habitats (see Appendix B-2), each is somewhat secretive, often hiding or taking refuge in dense vegetation, under debris, in burrows, or in steep rock crevices and mines. In most cases potentially suitable habitat for a species may be within many of the study areas; but, due to past vegetation clearing, little habitat may be found within many of the proposed Project sites. Considering the mobility of these animals, it is possible any of these species could pass through, forage within, or in some cases maintain burrows on Project sites. Potentially suitable habitat for one or more of these species is assumed to be found within 14 study areas (see Table 3.3-7), with the coast horned lizard and California mountain kingsnake potentially occurring within multiple locations (12 study areas and 3 study areas, respectively). Though not recorded by CDFW in the CNDDDB, the San Diego woodrat was discovered in the study area of Site RIH during surveys for a Southern California Edison project. The Tehachapi pocket mouse has been recorded within the vicinity of Site TPK, with a few additional occurrences (historic and recent) recorded in the Tehachapi Mountains. This is a very rare rodent known only from a few locations in a limited range. Its habitat includes native and nonnative grasslands, where it constructs burrows in loose, sandy soils. The primary threat to the species is thought to be habitat fragmentation, though any type of surface disturbance may cause adverse impacts if the species is present. The elevation of the Site TPK (4,885 feet) is within the elevation range for the species (3,500 to 6,000 feet). Scattered small mammal burrows were observed in the area of Site TPK; and suitable habitat may be present in the study area. No species-specific surveys have been conducted. Townsend's big-eared bat may forage in the study area of Site BJM, as well as other sites on Santa Catalina Island; but no potential roost sites of caves or mines are known to occur in the study area that could be impacted by Project activities. The western mastiff bat requires steep cliff faces with crevices for roosting; no proposed Project activities would impact these habitats. Each of these species is designated a species of concern by CDFW, though none are state or federally listed as threatened or endangered.

Construction Impacts

Construction activities include staging and stocking equipment, driving on access roads, parking vehicles, digging trenches, and clearing the ground surfaces within previously disturbed areas and in some cases removing native vegetation. Both Townsend's big-eared bat and western mastiff bat are nocturnal and would not interface with proposed Project activities. Though expected to flee the area when disturbed, it is possible that individuals of the coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be injured or killed by Project construction activities by being crushed, trapped in burrows, or caused by noise and vibrations to abandon otherwise safe cover sites, possibly resulting to loss of an individual animal but otherwise not affecting the local population.

There would be no impact to Townsend's big-eared bat or western mastiff bat due to construction-related impacts at sites BJM and OAT.

Construction-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.

Operational Impacts

The presence of the Project facility would not result in impacts to California mountain kingsnake, coast horned lizard, San Diego woodrat, Tehachapi pocket-mouse, Townsend’s big-eared bat, or western mastiff bat; and the occasional visit to the site by maintenance workers (generally once a month) would not alter the current level of human presence at the sites or otherwise change the nature of ongoing impacts. Emergency diesel generators would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. The noise would attenuate rapidly. The additional use of access roads (expected about once a month for the proposed Project) to conduct on-site maintenance could result in various small animals being run over on access roads or at the Project site.

There would be no impact to Townsend’s big-eared bat or western mastiff bat due to operational activities at sites BJM and OAT.

Operations-related impacts to coast horned lizard, California mountain kingsnake, San Diego woodrat, and Tehachapi pocket mouse would be less than significant at sites CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK.

Mitigation Measures

The following mitigation measures would be implemented for California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK (see Table 3.3-7) (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** WEAP
- BIO MM 4** Site Sanitation
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 10** No Pets
- BIO MM 11** Site Access
- BIO MM 18** Nesting Bird Protection

BIO MM 19 Trenches and Holes Management

Impacts after Mitigation

Though impacts to California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket-mouse at proposed Project sites would be less than significant without application of mitigation measures, these measures would still apply at these sites regardless of the level of significance and would further reduce the already less than significant impacts at sites CPK, ENT, FTP, H-17A, H-69B, LACFCP11, MMC, MTL2, RIH, SPN, TOP, and TPK. Since there would be no impact to Townsend's big-eared bat or western mastiff bat, no mitigation measures for these species apply to Project sites BJM and OAT.

Though the implementation of mitigation measures BIO MM 1, BIO MM 2, BIO MM 4, BIO MM 8 through BIO MM 11, BIO MM 18, and BIO MM 19, would reduce the likelihood of injury and mortality of small wildlife species resulting from Project construction and operations, individual small animals may be impacted or killed by Project construction or operation activities. The anticipated level of mortality is very low, however, and as such would not contribute to elevating the conservation status of any of the species analyzed herein. Therefore, the development of the proposed Project sites would not have a substantial adverse effect, either directly or through habitat modifications, to the California mountain kingsnake, coast horned lizard, San Diego woodrat, Tehachapi pocket mouse, Townsend's big-eared bat, or western mastiff bat.

There would be no impact to Townsend's big-eared bat or western mastiff bat due to construction or operations of the proposed Project.

Implementation of mitigation measures BIO MM 1, BIO MM 2, BIO MM 4, BIO MM 8 through BIO MM 11, BIO MM 18, and BIO MM 19 would further reduce the less than significant impacts related to the construction and operations of the proposed Project to California mountain kingsnake, coast horned lizard, San Diego woodrat, and Tehachapi pocket mouse.

Amphibians: Arroyo Toad, California Red-Legged Frog, Mountain Yellow-Legged Frog – Southern California DPS

Juveniles and adult arroyo toads spend much of their lives in riparian and upland habitats adjacent to breeding locations (USFWS 2011). Adults usually feed during the night, while newly metamorphosed toads may be active during the day. Breeding season extends from March to July, with shallow, slow-moving streams and standing water required for egg-laying. Individual toads have been observed as far as 1.2 miles from the streams where they breed but are most commonly found within 0.3 mile of those streams (USFWS 2001). The dispersal patterns in arroyo toads include the use of upland foraging sites, as well as up- and downstream corridors. Dispersal movements along the stream channel may be over 5 miles, as noted in a USFS record in 1999 and 2000 (USFWS 2001). Although dispersal behavior is not clearly understood, toads often concentrate in upland habitats on alluvial flats and sandy terraces in valley bottoms of active drainages. Sandy, loose soils in upland habitats provide areas for underground burrows during periods of inactivity (USFWS 2001). The extent of arroyo toad movements away from

the stream channel is influenced by rainfall amounts, availability of surface water, width of streamside terraces and floodplains, vegetative cover, and topography.

Populations of California red-legged frogs are most likely to occur where aquatic areas used for breeding (e.g., streams, deep pools, ponds, marshes, or lagoons) are surrounded by dispersal habitat. Adults usually feed during the night, while juveniles may forage during the day or night. Breeding season extends from November to April. Though egg-laying is typically associated with slow-moving water with dense riparian or emergent vegetation, breeding adults have been observed in unvegetated, shallow segments of stream. During the wet season, individual frogs are known to disperse up to 2 miles in a straight-line migration over uplands without regard to topography or vegetation type. They can also persist in areas of dense riparian vegetation up to 100 feet away from water. Dispersal away from breeding sites can occur during the summer when water is scarce and frogs are seeking summer habitat (e.g., under boulders, rocks, logs, or sheds; small mammal burrows; or incised stream channels) (USFWS 2002).

Juvenile and adult mountain yellow-legged frogs are highly aquatic and usually found within 5 to 10 feet of water (California Herps 2015a; Knapp 2012). Individuals are primarily active during the day (California Herps 2015). Breeding occurs as soon as the snow melts; March to May for the populations in southern California, and May to June for the Sierra Nevada populations (California Herps 2015). Shallow waters of streams, lakes, pools, or ponds are required for egg-laying (California Herps 2015; CDFW 2015b). Adults and larvae are thought to hibernate under the ice in deep water during the cold winter months (CDFW 2015b; Knapp 2012). During the active season, adults commonly move hundreds of feet to reach habitats for breeding, feeding, and overwintering (CDFW 2015b; Knapp 2012). Frequently, this movement follows lake shores and streams; however, adults will migrate short distances across dry areas (Knapp 2012).

Roadways and vehicle collisions pose a significant threat to dispersing frogs and toads due to the potential for being run over, causing injury or death. Runoff containing sediments and chemicals from roads and other sources can decrease habitat quality for amphibians.

None of the study areas include suitable habitat for the arroyo toad, California red-legged frog, or mountain yellow-legged frog; however, considering that these amphibians may disperse up to 2 miles across upland habitats, numerous Project sites fall within 2 miles of drainages or designated critical habitat where one or more of these species may occur. In addition, the Santa Monica Mountains National Recreation Area and Angeles National Forest each identified three drainages that provide suitable habitat for the California red-legged frog. Current survey information is unavailable, but these possible frog locations were considered to be occupied in the evaluation of proposed Project sites. Though it is suspected that the mountain yellow-legged frog is less likely to disperse overland to the same extent as the California red-legged frog, due to the lack of thorough dispersal studies the same evaluation standard of 2 miles is used for each of these amphibians in evaluating possible impacts from the construction and operations of proposed Project sites. Three proposed Project sites are within the 2-mile dispersal distance for the arroyo toad; 14 sites are within dispersal distance for the California red-

legged frog; and 8 sites are within dispersal distance of the mountain yellow-legged frog. Multiple species are present at 3 sites; 19 proposed Project sites fall within the 2-mile dispersal distance of one or more of these special status amphibians.

Construction Impacts

Construction of proposed Project sites would not result in any direct impacts to or loss of wetland or riparian habitats that may be occupied by arroyo toad, California red-legged frog, or mountain yellow-legged frog. Even though many of the proposed Project sites are on mountain peaks and ridgelines in steep mountain terrain, frogs, especially the California red-legged frog, may disperse across upland habitats regardless of the topography. If construction actions, including travel on access roads, would occur at night or during or following rain events, dispersing frogs or toads have the potential to be killed if run over by construction vehicles. Also, at the construction site, animals may be trapped or seek refuge in trenches, holes, or depressions that may retain water and subsequently may be killed or injured by on-site construction activities.

Impacts to arroyo toad, California red-legged frog, and mountain yellow-legged frog – Southern California DPS from construction activities associated with the proposed Project would be significant at sites CPK, FRP, GRM, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TOP, WMP, and WTR.

Operational Impacts

Once all construction activities are complete and any trenches, ditches, and steep-sided depressions are filled and leveled, amphibians may disperse across the Project site without incident. Since site maintenance activities are not expected to include nighttime access, mortality of frogs and toads along access roads is not considered an issue. If these sites are accessed following rain events, however, and frogs and toads may disperse during the day when maintenance workers could be using access roads, these amphibians could be killed.

Impacts to arroyo toad, California red-legged frog, and mountain yellow-legged frog – Southern California DPS from operations associated with the proposed Project would be significant at sites CPK, FRP, GRM, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TOP, WMP, and WTR.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites within 2 miles of drainages or designated critical habitat where one or more of these species may occur (at sites CPK, FRP, GRM, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TOP, WMP, and WTR) (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3	Biological Compliance Reporting
BIO MM 8	Biological Monitoring
BIO MM 9	Protect Native Vegetation and Common Wildlife
BIO MM 10	No Pets
BIO MM 11	Site Access
BIO MM 19	Trenches and Holes Management
BIO MM 21	Protected Amphibian Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed of the possible presence of protected amphibians (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) in the area and along access roads, and the measures to be taken to avoid impacts to these amphibians.
- b) As part of BIO MM 1 Biological Monitoring, the Biological Monitor shall be present during site preparation and placement of Project equipment. The monitor shall inspect the work area, including equipment storage sites and staging areas, for the presence of protected amphibians each day prior to initiation of on-site construction work following a measureable rain event (≥ 0.01 inch) while construction is ongoing.
- c) To protect dispersing frogs and toads, no Project-related on-site ground-disturbing activities or construction-related travel on access roads shall occur during the night or during rainy periods (within 24 hours of a measureable [≥ 0.01 inch] precipitation event or within 48 hours of a major [≥ 0.1 inch] precipitation event).
- d) To protect dispersing frogs and toads during normal site operations (non-emergency situations), these Project sites shall not be accessed by maintenance workers during the night or during rainy periods (within 24 hours of a measureable [≥ 0.01 inch] precipitation event or within 48 hours of a major [≥ 0.1 inch] precipitation event) (emergency situations are exempted).
- e) If a protected amphibian (i.e., arroyo toad, California red-legged frog, mountain yellow-legged frog - southern California DPS) is found within 50 feet of the construction site, all work that involves moving vehicles or ground disturbance shall cease until the animal moves on its own accord.
- f) If protected amphibians are present on the road, vehicles shall stop until the individual(s) move out of harm's way on their own accord.

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8 through BIO MM 11, BIO MM 19, and BIO MM 21 construction and operational personnel would be aware that dispersing amphibians may be present at proposed Project sites or along access roads during rainy periods. Measures precluding vehicle use during rainy periods greatly minimize the possibility of Project-related amphibian mortality.

Impacts associated with construction and operations activities associated with the proposed Project would be reduced to less than significant for the arroyo toad, California red-legged frog, and mountain yellow-legged frog with implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8 through BIO MM 11, BIO MM 19, and BIO MM 21 at sites at sites CPK, FRP, GRM, H-69B, JOP, LACFCP08, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, PWT, SPN, SUN, SUN2, TOP, WMP, and WTR.

Unarmored Three-spine Stickleback

The unarmored three-spine stickleback is a small, scaleless, freshwater fish found in slow-moving reaches in streams and rivers (USFWS 2009b), primarily in the headwaters of the Santa Clara River (USFWS 1980). The stickleback is a bottom feeder but will feed on the surface, eating various aquatic, and sometimes terrestrial, invertebrates. Three-spine sticklebacks feed primarily on benthic insects, small crustaceans, and snails and, to a lesser degree, on flatworms and nematodes (USFWS 2009b). Reproduction occurs in areas with adequate aquatic vegetation and slow-moving water where males can establish and vigorously defend territories. The male builds a nest of fine plant debris and algal strands and courts all females that enter his territory; a single nest may contain the eggs of several females. Following spawning, the male defends the nest, including newly hatched fry. The unarmored three-spine stickleback is believed to live for only one year (USFWS 2009b). Threats to the unarmored three-spine stickleback include: stream channelization, urbanization, introduction of predators and competitors, introgression, agricultural impacts, oxygen reduction, groundwater removal, transpiration, off-road vehicles, toxic spills and discharges, addition of too much sewage water to river systems (affecting water quality and velocity), and impoundment of water.

The Santa Clara River in the vicinity of site LACFCP11 is not perennial, though the unarmored three-spine stickleback may recolonize previously dry portions of the stream during wet periods. Based on records in the CNDDDB, stickleback presence in the river is more reliable about 1 mile downstream. The Santa Clara River is on the opposite side of Soledad Canyon Road from Site LACFCP11, as close as 50 feet to the Santa Clara River corridor. Maher Canyon, an ephemeral drainage within the study area of Site LACFCP11, crosses under Soledad Canyon Road and joins the Santa Clara River.

Construction Impacts

Though no aquatic, wetland, or riparian habitat would be removed due to proposed Project activities, the Project site is in close proximity to the Santa Clara River. No disturbance to fish from construction activities would occur even if water would be present in the river during construction because no Project activities would occur within the river corridor (north of Soledad Canyon Road). Construction activities

that involve ground disturbance can result in sediment transport into Maher Canyon and the Santa Clara River. Improperly managed equipment could lead to chemical spills, release of petroleum products, or pollution by other toxic substances that could enter aquatic habitats and possibly impact unarmored three-spine stickleback downstream in the Santa Clara River. Implementation of Project BMPs (Appendix C) as part of proposed Project actions would preclude transport of sediment or toxic substances into unarmored three-spine stickleback habitat. Specifically, BMPs 8 through 16 provide for the following actions:

- 1) Delineate clearing limits, easements, setbacks, sensitive or critical areas, trees, drainage courses, and buffer zones to prevent excessive or unnecessary disturbances and exposure. Minimize the size of staging areas to the extent practical.
- 2) Avoid excavation and grading during wet weather.
- 3) Use berms and drainage ditches to divert runoff around exposed areas. Place diversion ditches across the top of cut slopes.
- 4) Control stormwater flowing to and through the Project site.
- 5) Protect slopes by using measures such as erosion control blankets, bonded fiber matrices, turf reinforcement mats, silt fences (for moderate slopes), etc.
- 6) Retain sediment on site and control dewatering practices by using sediment traps or basins for large areas (> 1 acre) when appropriate.
- 7) Temporarily protect storm drain inlets until the site is stabilized. Protect drainage courses, creeks, or catch basins with fiber rolls, silt fences, sand/gravel bags and/or temporary drainage swales if on-site sediment control measures are not adequately preventing stormwater runoff.
- 8) Use appropriate erosion control measures to reduce siltation and runoff of contaminants into wetlands and adjacent, ponds, streams, or riparian woodland/scrub.
- 9) Conduct routine inspections of erosion control measures especially before and immediately after rainstorms, and repair if necessary.

There would be no impact to unarmored three-spine stickleback due to construction at Site LACFCD11.

Operational Impacts

Ongoing operations at Site LACFCD11 would not result in any actions that could impact unarmored three-spine stickleback or otherwise degrade aquatic habitats.

There would be no impact to unarmored three-spine stickleback due to proposed operations activities at Site LACFCD11.

Mitigation Measures

No mitigation measures are required.

There would be no impact to unarmored three-spine stickleback due to proposed construction or operation activities at Site LACFCD11.

Monarch Butterfly

Monarch butterflies undertake complex migratory behaviors and disperse widely, feeding on various nectar sources. The butterflies overwinter from November through January, roosting in large fir, pine, or eucalyptus trees, often reusing specific roost trees from year to year, with many butterflies roosting at the same site. During migration they will roost in trees for the night in small clusters. While at roost sites, butterflies are susceptible to disturbance from human activities.

Habitat for monarch butterflies may be found within the study area of 15 proposed Project sites (see Table 3.3-7). Of these, eight are within the general dispersal pathways of the monarch (sites CPK, GRM, LACFCP08, PDC, PWT, SPN, WS1, ZHQ), which may pass through the area taking advantage of nectar sources; however, no suitable trees for roosting are located in these eight study areas. Large trees are present within the study area of the other seven proposed Project sites (sites ENC1, ENT, H-69B, LACF072, LEPS, TOP, and WAD), which may be used as temporary roosts.

Construction Impacts

Impacts to the monarch butterfly due to construction activities would result from loss of or damage to trees used as temporary roosts. Construction-related noise or disturbance due to the presence of human activity would prevent butterflies from using roost sites when in close proximity (e.g., 50 feet) to roost trees. These roosts may be used at any time of the year by the monarch butterfly. Upon the loss of a roost tree or disturbance at a roost site, butterflies may simply fly away to another site. However, depending on weather conditions, time of day, and the number of butterflies present, mortality of some butterflies could occur, although not at a level that would be detectable within the local population.

There would be no impacts to monarch butterfly migration pathways from proposed Project construction at sites CPK, GRM, LACFCP08, PDC, PWT, SPN, WS1, and ZHQ.

Impacts to the monarch butterfly from proposed Project construction would be less than significant at sites ENC1, ENT, H-69B, LACF072, LEPS, TOP, and WAD.

Operational Impact

Ongoing operations of the proposed Project sites would not result in the loss of native vegetation, and presence of maintenance workers would be infrequent (approximately one visit a month).

No impact to the monarch butterfly would occur due to proposed Project operations at sites CPK, ENC1, ENT, GRM, H-69B, LACF072, LACFCP08, LEPS, PDC, PWT, SPN, TOP, WAD, WS1, and ZHQ.

Mitigation Measures

The following mitigation measures would be implemented at sites ENC1, ENT, H-69B, LACF072, LEPS, TOP, and WAD which provide potential monarch butterfly roost habitat (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

- BIO MM 2** WEAP
- BIO MM 3** Biological Compliance Reporting
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 22** Monarch Butterfly Protection
- a) Preconstruction surveys by a qualified biologist shall provide for a thorough examination of suitable roost trees to determine if butterflies are using the site for roosting; surveys shall be repeated once a week throughout the construction period.
 - b) If butterflies are found roosting in the area, a protection buffer of 50 feet shall be established around each roost; and no construction activities would be undertaken within the buffer area while butterflies are roosting.
 - c) Loss of trees or removal of large limbs on trees that may provide suitable roost habitat for monarch butterflies shall be avoided.

Impacts after Mitigation

Though impacts to monarch butterflies at seven proposed Project sites would be less than significant without application of mitigation measures, these measures would still apply at these sites regardless of the level of significance and would further reduce the already less than significant impacts at sites ENC1, ENT, H-69B, LACF072, LEPS, TOP, and WAD. With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, and BIO MM 22, impacts to monarch butterfly would be avoided since no trees with roosting butterflies would be removed or damaged; and potential disturbance to butterfly roost trees during construction activities would be precluded.

Implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, and BIO MM 22 at seven proposed Project sites would further reduce the less than significant construction and operational impacts to the monarch butterfly at ENC1, ENT, H-69B, LACF072, LEPS, TOP, and WAD.

There would be no impacts to monarch butterflies at sites CPK, GRM, LACFCP08, PDC, PWT, SPN, WS1, and ZHQ, and no recommended mitigation measures.

Special Status Plants: Big Bear Valley woollypod, Braunton's milk-vetch, California dissanthelium, Davidson's bush-mallow, decumbent goldenbush, Greata's aster, grey-leaved violet, intermediate mariposa-lily, island rush-rose, Lyon's pentachaeta, marcescent dudleya, Rock Creek broomrape, round-leaved filaree, San Antonio milk-vetch, Santa Catalina Island bedstraw, Santa Monica dudleya, Santa Susana tarplant, slender mariposa-lily, Santa Cruz Island rockcress, Sonoran maiden fern, Wallace's nightshade, white-veined monardella, Wiggins' cryptantha

Potentially suitable habitat for one or more of 23 species of special status plants may be found within the study area of one or more of 28 proposed Project sites (see Table 3.3-7). Each species has specific habitat requirements and a species-appropriate survey period (see Appendix B-2). The determination that these plant species may be present is based on a review of past collection records and an assessment of habitat in each study area, even if the plants were not observed during the field visit. Generally, loss and degradation of habitat has been the cause of decline for these plant species.

Two species, Davidson's bush mallow and Big Bear Valley woollypod were identified in Project-specific surveys. Davidson's bush mallow was located during the site reconnaissance survey and observed at Site MTL2, adjacent to previous disturbance from construction of the existing facilities; this species has the potential to be found at three additional proposed Project locations. A potential specimen of Big Bear Valley woollypod was observed at Site TMT and for the purposes of analysis is assumed to be this species, but a summer survey is required for definitive species-level identification.

Other species were not identified in surveys but were determined to have a potential to occur within the study area of proposed Project sites. Braunton's milk-vetch, an ESA-listed species, has the potential to occur at 11 proposed Project sites, more than any other special status plant species. Braunton's milk-vetch has a high potential to occur at Site GRM due to the presence of high quality habitat; known occurrences of the plant are within designated critical habitat less than 0.25 mile from the site.

Of the 15 special status plant species recorded within 1 mile of proposed Project Site TWR (see Table 3.3-3) on Santa Catalina Island, 6 species have the potential to occur within the study area (see Table 3.3-7), the greatest potential number of plant species for any site.

Construction Impacts

Each proposed Project site is located with an existing facility. Each location has a unique set of past developments, existing facilities, and ecological conditions. Some level of ground clearing has occurred at each site for the existing facility and access road. Some sites include extensive paved and fenced compounds, dirt and paved roads, buildings, water tanks, and communications towers. Ground clearing associated with past construction, vehicle parking, and ongoing vegetation management programs for protection from wildfire eliminated much of the potential habitat for special status plants on the proposed Project sites. Implementation of Project BMPs as part of proposed Project actions (specifically BMPs 8 through 16; Appendix C) to control water runoff and sedimentation would preclude impacts to special status plants due to potential alterations in drainage patterns.

Generally, most of these locations have been cleared of native vegetation; however, the development at some Project sites could result in the loss of native plants if the proposed Project developments would result in expanding the Project site into areas not already cleared of native vegetation, or if limited space is available for construction activities associated with erecting a new tower or monopole. Vehicles may drive over or park on the edge of the disturbed areas, which may impact native vegetation. Additional ground disturbance may occur due to trenching that may be required for electrical connections, drilling for geotechnical investigations, transporting equipment along access roads, possible alterations to drainage patterns, changes to the fire regime, or contributing to the spread of nonnative plants.

Impacts to 23 species of special status plants from construction activities would be significant at sites AGH, BJM, CPK, DPK, ENC1, ENT, FRP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LEPS, LPC, MTL2, PMT, PWT, RIH, SPN, TMT, TOP, TWR, VPK, and WTR.

Operational Impacts

The regular maintenance and operations of proposed Project facilities would not alter the context and management of each site because of the collocation with existing facilities. Once all new ground-disturbing activities have been completed, no operational impacts to special status plants would occur.

There would be no impacts to 23 species of special status plants from operations associated with proposed Project sites AGH, BJM, CPK, DPK, ENC1, ENT, FRP, GRM, H-17A, H-69B, JPK, JPK2, JOP, LACF072, LACFCP08, LACFCP09, LEPS, LPC, MTL2, PMT, PWT, RIH, SPN, TMT, TOP, TWR, VPK, and WTR.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that have potential habitat for these species (AGH, BJM, CPK, DPK, ENC1, ENT, FRP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LEPS, LPC, MTL2, PMT, PWT, RIH, SPN, TMT, TOP, TWR, VPK, and WTR) (mitigation measures previously described are listed by name only):

BIO MM 1 Mitigation Monitoring and Reporting Plan

BIO MM 2 WEAP

BIO MM 3 Biological Compliance Reporting

BIO MM 8 Biological Monitoring

BIO MM 9 Protect Native Vegetation and Common Wildlife

BIO MM 23 Prevent the Spread of Nonnative Vegetation

- a) All ground disturbed by construction activities that would not be paved, landscaped, or otherwise permanently stabilized (e.g., graveled, soil compaction) shall be seeded using species native to the Project vicinity.

- b) To prevent the introduction of invasive species seeds, all earthmoving and hauling equipment shall be inspected at the equipment storage facility to remove soil and vegetation; and the equipment shall be washed prior to entering the construction site.
- c) To prevent invasive species seeds from leaving the site, all construction equipment shall be inspected, and all attached plant/vegetation and soil/mud debris shall be removed prior to leaving the construction site.

BIO MM 24 Special Status Plants Surveys and Protection

- a) As part of BIO MM 2 WEAP, construction crews shall be informed prior to the onset of construction activities of the possible presence of special status plants in the area and the importance of maintaining native vegetation.
- b) At identified sites, surveys for special status plants shall be conducted by a qualified botanist prior to ground-disturbing activities, in the proper season and in suitable habitat surrounding the proposed Project site or any area subject to ground disturbance, including access roads.
- c) If a special status plant is found to be present or if surveys are determined to be inconclusive, the areas requiring special protection would be marked prior to construction to provide a buffer to maintain the ecological context of the location at which the plant was found.
- d) Mitigation measure BIO MM 8 Biological Monitoring shall apply at proposed Project sites where special status plants or their habitat are present, and protection buffers would be monitored for compliance.

Impacts after Mitigation

In accordance with mitigation measure BIO MM 24, thorough species-specific surveys would be conducted at each proposed Project site that has been identified as potentially providing suitable habitat for a special status plant species and at which any clearing of native vegetation would occur. These surveys would be used to identify occurrences of special status plant species and to mark buffer areas around such occurrences to protect individual plants. These surveys would not include the entire study area but would be focused where potential impacts could occur and so would be inclusive of any new temporary or permanent ground-disturbing activities and would include an appropriate buffer (generally greater than 50 feet). The application of mitigation measures for protection of native vegetation (BIO MM 9) and measures to control the spread of nonnative plants (BIO MM 23) would address potential impacts to special status plants associated with nonnative vegetation.

Implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, BIO MM 23, and BIO MM 24 would reduce to less than significant any construction impacts to the 23 species

of special status plants identified at proposed Project sites AGH, BJM, CPK, DPK, ENC1, ENT, FRP, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LEPS, LPC, MTL2, PMT, PWT, RIH, SPN, TMT, TOP, TWR, VPK, and WTR.

BIO-2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sensitive Communities

Table 3.3-8 provides a list of sensitive communities which occur within the study area of proposed Project sites, as recorded in the CNDDDB and/or verified during reconnaissance surveys of each study area.

Table 3.3-8: Sensitive Communities Identified in the Field in the Study Areas

Sensitive Community	Study Area
California Walnut Woodland	AGH, AJT, PHN, SDW
Southern California Threespine Stickleback Stream	LACFCP11
Southern Coast Live Oak Riparian Forest and Woodland	JOP, LACF072, LACFCP11, LPC, MML
Southern Cottonwood Willow Riparian Forest	LACFCP11
Southern Mixed Riparian Forest	LEPS, OAT
Southern Riparian Scrub	LACFCP11
Southern Sycamore Alder Riparian Woodland	FTP, GRM, LACFCP11
Wildflower Field	TPK

The California Walnut Woodland, differentiated from scattered black walnut trees, is found in association with several study areas. At the study areas for sites PHN and SDW, walnut stands are represented on north-facing slopes below ridgelines and hilltops. The California Walnut Woodland community occurs within proposed Project sites AGH and AJT. Individual walnut trees are within or directly adjacent to AGH, AJT, and SDW Project sites. Also, established access roads to these sites pass through or near walnut community stands.

Numerous examples of various riparian woodland communities occur in canyons within the study area of several Project locations, as most Project sites are on the top of peaks and ridges where the head of canyons form. One or more of the five riparian communities listed in Table 3.3-8 occur within the study areas of proposed Project sites FTP, GRM, JOP, LACF072, LACFCP11, LEPS, LPC, MML, and OAT.

Site LACFCP11 has the most communities that occur within its study area. This site is on a low ridgeline above Soledad Canyon Road; on the opposite side of the road within the study area of Site LACFCP11 is the floodplain of the Santa Clara River. Maher Canyon, an ephemeral drainage within the study area of Site LACFCP11, crosses under Soledad Canyon Road and joins the Santa Clara River. Vegetation within

the Santa Clara River corridor and within the Maher Canyon drainage corridor includes mature Southern Coast Live Oak Riparian Forest and Woodland, Southern Cottonwood Willow Riparian Forest, Southern Mixed Riparian Forest, and Southern Sycamore Alder Riparian Woodland communities. Though this portion of the Santa Clara River is not perennial, it has been classified as Southern California Three-spine Stickleback Stream Community, with records of the fish occurring about 1 mile downstream. The river corridor has been highly impacted by heavy equipment and by dumping or storage of construction material and is used as a source of water for helicopter bucket dips from a maintained water storage tank; on the opposite side of the river corridor from Site LACFCP11 is an active railroad line.

Other identified sensitive communities in proposed Project study areas include Wildflower Field at Site TPK.

Construction Impacts

Impacts to sensitive communities due to construction activities would occur where components of a community (e.g., individual trees or shrubs) are located where ground-disturbing activities may occur, either due to expansion of the site or activities associated with construction of facilities. At most Project sites, all ground-disturbance activities would be limited to those areas that have previously been impacted and where native vegetation is no longer present or is included in a vegetation management regime to maintain firebreaks surrounding the existing facilities. At sites AGH, AJT, SDW, and TPK, native vegetation within sensitive communities could be impacted by on-site activities. When construction vehicles access a site, they may drive through sensitive woodland communities or cross drainage corridors occupied by riparian communities. Vehicles may brush against vegetation on narrow access roads, park on vegetation, or run over shrubs and other native vegetation while turning and positioning large construction vehicles, resulting in breaking woody stems, crushing vegetation, and compacting soils. Equipment storage sites and laydown areas may include native vegetation and components of sensitive communities. Root systems of native trees and shrubs could be damaged by trenching for power line installation, parking of vehicles, or paving; bucket-lift trucks and cranes used to raise antennas could damage tree limbs.

No Project activities are planned for or would occur within riparian communities found in the drainages and canyons in association with any Project site. At most sites, sensitive riparian communities are downslope and/or across existing roads from the Project site. Site LACFCP11 and its access road are immediately adjacent to the riparian communities of the Maher Canyon drainage and just across Soledad Canyon Road from the Santa Clara River. No direct impact to or removal of mature riparian trees is expected, and potential impacts to these sensitive riparian and stream communities due to surface runoff and erosion would be controlled by BMPs 8 through 16.

The Wildflower Field at Site TPK is dependent on the timing of adequate precipitation to trigger germination and growth. In general, early rains favor nonnative weeds, and late rains result in the germination of wildflowers. The Wildflower Field is largely defined by the seed bank within the nonnative grassland community that dominates the site and study area. Construction activities at Site

TPK could include impacts to nonnative grassland, which extends across the site and is absent only from paved areas or where soils are highly compacted due to past construction activities and repeated vehicle presence.

Impacts from construction activities associated with the proposed Project to sensitive natural communities would be significant at proposed Project sites AGH, AJT, SDW, and TPK.

Impacts from construction activities associated with the proposed Project to sensitive natural communities would be less than significant at proposed Project sites FTP, GRM, JOP, LACF072, LACFCP11, LEPS, LPC, MML, OAT, and PHN.

Operational Impacts

The presence of the Project facility would not result in impacts to sensitive natural communities. The regular maintenance and operations at proposed Project facilities would not alter the context and management of each site because of the collocation with existing facilities. The occasional visit to the site by maintenance workers (generally once a month) would not alter the current level of human presence at the sites or otherwise change the nature of ongoing impacts. Once all new ground-disturbing activities have been completed and limits of vegetation management have been established, there would be no operational impacts to sensitive natural communities.

No impacts to the sensitive natural communities would occur at any of the proposed Project sites due to operations.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that provide potentially suitable habitat for sensitive natural communities (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 11** Site Access
- BIO MM 19** Trenches and Holes Management
- BIO MM 23** Prevent the Spread of Nonnative Vegetation

Impacts after Mitigation

Application of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, BIO MM 11, BIO MM 19, and BIO MM 23, would reduce the potential for impacts to sensitive communities during construction and operation activities, and would further reduce the already less than significant impacts to riparian communities. These measures apply at the 14 proposed Project sites with sensitive natural communities within or adjacent to the study area: AGH, AJT, FTP, GRM, JOP, LACF072, LACFCP11, LEPS, LPC, MML, OAT, PHN, SDW, and TPK. With the implementation of these mitigation measures most, if not all, perennial vegetation would be preserved on site (BIO MM 9), and parking under the dripline of trees would be precluded to protect against soil compaction (BIO MM 9). No Project construction activities would be conducted within a riparian zone; however, individual plants may be present at the Project site or along access roads that cannot be avoided and must be trimmed or removed to accommodate Project needs. If this were to occur, large trees would still be avoided (BIO MM 9). Any loss of vegetation from sensitive woodland or Wildflower Field communities would be the minimum necessary as demarked by the biological monitor (BIO MM 8). With mitigation, impacts associated with loss of vegetation would occur at the periphery of a developed site and so would not compromise the integrity of the sensitive community. Therefore, the development of the proposed Project sites would not have a substantial adverse effect, either directly or through habitat modifications, to sensitive natural communities.

Construction and operations of 14 identified proposed Project sites would result in less than significant impacts to sensitive natural communities with implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, BIO MM 11, BIO MM 19, and BIO MM 23.

Critical Habitat

The evaluation of potential impacts to critical habitat includes the assessment of whether primary constituent elements (PCEs) are present, and then the assessment of whether proposed Project-related activities would impact those PCEs. Nine species have designated critical habitat within 1 mile of one or more of 16 proposed Project sites (see Table 3.3-5). Five sites have critical habitat within 1 mile for more than one species. Of the nine species with designated critical habitat within 1 mile of a Project site, five of those species have designated critical habitat within study areas (extended to 800 feet for Braunton's milk-vetch at Site GRM) at one or more of eight sites (Table 3.3-9). For three species, critical habitat is found with the proposed Project site boundary at five sites. Access roads to six sites pass through critical habitat of four species (see Table 3.3-9).

Table 3.3-9: Designated Critical Habitat Near Proposed Project Sites

Designated Critical Habitat	Study Area	Critical Habitat in Proposed Project Site	Approximate Length of Access Road through Critical Habitat (mi)
arroyo toad	LACFCP11	Y	1.00+
Braunton's milk-vetch	GRM (study area extended to	N	0.50 – 1.50

Table 3.3-9: Designated Critical Habitat Near Proposed Project Sites

Designated Critical Habitat	Study Area	Critical Habitat in Proposed Project Site	Approximate Length of Access Road through Critical Habitat (mi)
	800 feet)		
California red-legged frog	WMP	Y	0.50
coastal California gnatcatcher	H-17A	Y	0.15
	PHN	N	0.50
	RIH	Y	1.50
	SDW	Y	0
western snowy plover	ZHQ	N	0

Coastal California Gnatcatcher Critical Habitat

Critical habitat PCEs for the gnatcatcher include various coastal sage scrub vegetation communities and their successional stages; also included are non-sage scrub habitats such as chaparral, grassland, and/or riparian areas in proximity to the sage scrub habitats that provide space for dispersal, foraging, and nesting. Critical habitat does not include man-made structures (such as buildings, aqueducts, airports, roads, and other paved areas and the land on which they are located) existing on the effective date of the critical habitat rule and not containing one or more of the PCEs (USFWS 2007a).

Though designated critical habitat is in close proximity to the construction location of proposed Project sites PHN and SDW, habitat components at these sites are highly compromised or not present due to past human activities and current management at each site. PCEs are present at proposed Project sites H-17A and RIH within the study area and within or adjacent to the proposed Project site boundary.

Site H-17A

The study area and surrounding lands of Site H-17A, including the Project site itself, are within designated critical habitat for the gnatcatcher. The southwestern portion of the study area contains coastal sage scrub vegetation; the eastern portion contains nonnative grassland with scattered blue elderberry and walnut in the draws and north-facing slopes. Site H-17A contains a large area of pavement and other cleared lands. The ridgeline from the site that parallels the access road supports moderate to high quality habitat dominated by California sagebrush, California buckwheat, coast prickly pear cactus, and lemonadeberry. These and other habitat components constitute PCEs. The access road passes through about 0.15 mile of critical habitat with suitable nesting habitat alongside much of the road. Extensive coastal sage scrub habitats are found on surrounding hillsides outside the study area.

Site PHN

At Site PHN, the study area includes designated critical habitat for the coastal California gnatcatcher; the site itself is not within critical habitat. The existing facilities are within a paved and fenced compound. The area surrounding the compound is either mowed or treated with herbicide. The study area is

primarily nonnative grassland with small patches of coastal sage scrub vegetation on steep slopes to the south near the perimeter of the study area within critical habitat. The paved access road leading to Site PHN passes through about 0.5 mile of critical habitat.

Site RIH

The study area for Site RIH includes native and restored coastal sage scrub vegetation and nonnative grassland. At least one pair of gnatcatchers was known to nest in 2014 in or near the study area, based on surveys associated with a Southern California Edison project. The study area is presumed occupied. Coastal sage scrub vegetation and critical habitat PCEs occur within and adjacent to Site RIH as well as throughout the site's study area.

Site SDW

Designated critical habitat and PCE components for coastal California gnatcatcher occur within the study area of Site SDW; an unbuildable portion (steep slope) of the Project site overlaps the designated critical habitat by approximately 20 feet. At an elevation of 1,227 feet, critical habitat within the study area is primarily nonnative grassland, with only minor stands of coastal sage scrub on very steep slopes. The largest of these stands is less than 0.5 acre in extent, and the study area is approximately 250 feet above the predominant maximum elevation range of nesting gnatcatchers (99 percent of all gnatcatcher nesting occurrences are below 984 feet elevation). The study area includes residential or other developed lands in ruderal condition or planted with ornamental vegetation. The canyon and drainage to the south of Site SDW is within designated critical habitat and is the headwaters of Walnut Creek. The area has been impacted by development and past fires and is composed of nonnative grasslands dominated by wild oats and brome grasses with California black walnut trees in the drainage bottoms and scattered shrubs including Mexican elderberry and coast prickly pear cactus. A few steep slopes and road cuts include scattered, small patches of remnant coastal sage scrub vegetation, composed largely of coast prickly pear but also including sparse California sagebrush on the steepest slopes.

Construction Impacts

Impacts to designated critical habitat could occur due to construction activities where PCEs may be affected by ground-disturbing activities, resulting in damage to or loss of native shrubs, or otherwise may result in a reduction of the land surface that may support PCEs. Impacts associated with construction-related noise or human presence are addressed based on effects to the bird species under Impact Criteria 1 rather than as an impact to the physical habitat (i.e., PCEs) addressed under Impact Criteria 2.

Habitat conditions for gnatcatchers in or adjacent to critical habitat at sites PHN and SDW appear marginal, at best, due to the lack of PCEs and the extent of existing ground surface that has been previously cleared of vegetation, is paved over, has compacted soils, or is being maintained with landscaped vegetation. All construction activities at these sites can be accommodated within these previously disturbed areas; no loss of or impacts to PCEs would occur at sites PHN or SDW. The paved, restricted access roadway to Site PHN passes through almost 0.5 mile of critical habitat where PCEs

(scattered shrubs) occur adjacent to the road; vehicles would not need to leave the road through this area.

There would be no impacts to coastal California gnatcatcher critical habitat associated with Project construction at sites PHN and SDW.

Site development and construction activities at sites H-17A and RIH could impact PCEs and result in damage to or loss of native shrubs. At Site H-17A, patches of native shrubs (i.e., PCEs) within designated critical habitat and suitable for use by gnatcatchers are in close proximity to the existing facilities and within the identified Project boundary of the site, as well as immediately adjacent to about 800 feet of the paved access road leading to Site H-17A. The access road to Site H-17A has a hairpin turn at the top of the ridgeline where the facilities are located. Construction vehicles may attempt to cut across the curve and damage shrubs; other construction activities could damage or destroy native vegetation within or in close proximity to the construction site and equipment storage areas.

Impacts to coastal California gnatcatcher designated critical habitat due to construction activities at Site H-17A would be significant.

Critical habitat PCEs are found throughout the study area at Site RIH, including adjacent to and within the site boundary; and gnatcatchers are known to nest nearby. Development of Project facilities at Site RIH could result in loss of coastal sage scrub vegetation due to expansion of the existing facilities, vehicle parking, equipment storage and staging, construction of a retaining wall, and turnaround space for large construction vehicles. The paved access road passes through critical habitat where scattered patches of vegetation include PCEs.

Impacts to coastal California gnatcatcher designated critical habitat due to construction activities at proposed Project Site RIH would be significant.

Operational Impacts

The presence of the proposed Project facility would not result in impacts to designated critical habitat for the coastal California gnatcatcher. The regular maintenance and operations of Project facilities would not alter the context and management of each site because of the collocation with existing facilities. The occasional visit to the site by maintenance workers (generally once a month) would not alter the current level of human presence at the sites or otherwise change the nature of ongoing impacts. Once all new ground-disturbing activities have been completed and limits of vegetation management established, no operational impacts to critical habitat or its PCEs would occur.

There will be no impact to designated coastal California gnatcatcher critical habitat or identified PCEs due to operations of the proposed Project at sites H17A, PHN, RIH, and SDW.

Mitigation Measures

The following mitigation measures would be required at proposed Project sites that include designated critical habitat for the coastal California gnatcatcher (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 11** Site Access
- BIO MM 12** Coastal California Gnatcatcher Protection of Habitat
- BIO MM 19** Trenches and Holes Management
- BIO MM 23** Prevent the Spread of Nonnative Vegetation

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO 8, BIO MM 9, BIO MM 11, BIO MM 12, BIO MM 19, and BIO MM 23, most perennial vegetation (i.e., gnatcatcher critical habitat PCEs) would be preserved on site (BIO MM 9 and BIO MM 12); however, individual plants may be present at proposed Project sites or along access roads that cannot be avoided and must be trimmed or removed to accommodate Project needs. Some loss of shrubs is expected at sites H-17A and RIH. Individual native shrubs would be removed only if absolutely necessary (BIO MM 12), and construction limits would be marked and monitored for compliance by the biological monitor (BIO MM 8). These potential impacts at sites H-17A and RIH would be limited to the periphery of developed locations and so would not be expected to compromise the integrity or continued function of critical habitat.

There would be no impacts to designated coastal California gnatcatcher critical habitat due to construction and operations of the proposed Project at sites PHN and SDW.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO 8, BIO MM 9, BIO MM 11, BIO MM 12, BIO MM 19, and BIO MM 23 at proposed Project sites H-17A and RIH the proposed Project would result in less than significant construction and operations impacts to coastal California gnatcatcher critical habitat.

Western Snowy Plover Critical Habitat

Proposed Project Site ZHQ is located at the Zuma Beach lifeguard station, within a paved parking lot between the Pacific Coast Highway and the beach. Western snowy plover critical habitat has been designated along the beach adjacent to and within the study area at Site ZHQ; critical habitat does not occur on the Project site. The Site ZHQ study area is located at about the midpoint of the critical habitat unit that extends almost 3 miles along the coast. This critical habitat unit is considered occupied and an important wintering area.

Western snowy plover critical habitat PCEs (USFWS 2012) are sandy beaches, dune systems immediately inland of an active beach face, salt flats, mud flats, seasonally exposed gravel bars, artificial salt ponds and adjoining levees and dredge spoil sites with:

- 1) Areas that are below heavily vegetated areas or developed areas and above the daily high tides
- 2) Shoreline habitat areas for feeding, with no or very sparse vegetation, that are between the annual low tide or low-water flow and annual high tide or high-water flow, subject to inundation but not constantly under water, that support small invertebrates, such as crabs, worms, flies, beetles, spiders, sand hoppers, clams, and ostracods, that are essential food sources
- 3) Surf- or water-deposited organic debris, such as seaweed (including kelp and eelgrass) or driftwood located on open substrates that supports and attracts small invertebrates and provides cover or shelter from predators and weather and assists in avoidance of detection for nests, chicks, and incubating adults
- 4) Minimal disturbance from the presence of humans, pets, vehicles, or human-attracted predators, providing relatively undisturbed areas for individual and population growth and for normal behavior

Critical habitat does not include man-made structures (such as buildings, roads, paved areas, boat ramps, and other developed areas and the land on which such structures are directly located) existing within the legal boundaries on the effective date of the critical habitat rule.

The beach at proposed Project Site ZHQ is highly managed (e.g., sand is bulldozed and piled) and is a focal area for recreationists, whose presence would likely preclude nesting by the plover on the beach outside protected areas; however, conditions and nesting sites may change from year to year. Plovers may be more prevalent in this area during winter when few recreationists are on the beach. The beach is managed for recreation and kept free of debris and contains low-quality habitat for feeding and for nesting. The only vegetation is found in ornamental gardens near buildings. The only native species are considered weedy volunteers in the gardens or in cracks in the concrete and asphalt. None of the PCEs for critical habitat of western snowy plover are present within the site boundary of Site ZHQ, but PCEs are present within the study area.

Construction Impacts

Designated critical habitat occurs along the beach adjacent to Site ZHQ and within the study area but excludes the paved parking area and the land on which the present structures have been built (USFWS

2012a). All construction activities associated with proposed Project Site ZHQ are restricted to paved and developed areas that are not considered part of critical habitat. Construction activities would not result in loss of or impact to any critical habitat PCEs.

No construction related impacts to western snowy plover designated critical habitat would occur at Site ZHQ.

Operation Impacts

The presence of a monopole could provide perching locations for ravens and gulls from which to observe and locate their prey; these birds are predators of snowy plovers and their nests. The presence of these “human-attracted predators” (see PCE 4, above) may compromise the suitability and function of designated critical habitat.

Impacts to western snowy plover designated critical habitat from operations at proposed Project Site ZHQ would be significant.

Mitigation Measures

The following mitigation measures would be required at proposed Project Site ZHQ that includes designated critical habitat for the western snowy plover (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 6** Anti-perch Devices
- BIO MM 8** Biological Monitoring

Impacts after Mitigation

Mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, and BIO MM 10 are required at proposed Project Site ZHQ. Implementation of BIO MM 6 would provide for anti-perch devices on any elevated horizontal surface associated with the Project facility that may be suitable as perch or nest sites for raptors, ravens, gulls, or other large birds that are potential predators of western snowy plovers. BIO MM 10 does not allow pets to be brought to the Project sites. These mitigation measures minimize disturbance from the presence of pets and human-attracted predators so as not to compromise the stability and function of critical habitat.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 6, BIO MM 8, and BIO MM 10 at Site ZHQ the proposed Project would result in less than significant operations impacts to the western snowy plover.

Braunton's Milk-vetch Critical Habitat

Braunton's milk-vetch grows in association with disturbances, such as along road edges and fuel breaks, but is most closely associated areas of chaparral vegetation that has previously burned. The plant will persist in bare areas, especially with carbonate bedrock. Critical habitat for Braunton's milk-vetch does not occur within the Project site; critical habitat, however, has been designated in the Santa Monica Mountains and is within 800 feet of Site GRM. Site GRM is located within the chaparral vegetation community; laurel sumac, California bush buckwheat, bush monkeyflower, several species of *Ceanothus*, and deerweed are common throughout the study area. Several unpaved roadways lead up the slope toward the proposed Project site and circle the existing facilities; depending on the route taken to Site GRM, the access road may pass through 0.5 mile or 1.5 miles of designated critical habitat. Several footpaths that could provide potential habitat lead to the existing facility. The plant could also appear within the study area after a fire.

The PCEs for Braunton's milk-vetch (USFWS 2006) are the habitat components that provide:

- 1) Calcium carbonate soils derived from marine sediment
- 2) Low proportion (less than 10 percent) of shrub cover directly around the plant
- 3) Chaparral and coastal sage scrub communities characterized by periodic disturbances that stimulate seed germination (e.g., fire, flooding, erosion) and reduce vegetative cover

Critical habitat does not include man-made structures existing on the effective date of the critical habitat rule and not containing one or more of the PCEs, such as buildings, aqueducts, airports, and roads, and the land on which such structures are located (USFWS 2006).

Construction Impacts

Though Site GRM may include suitable and high quality habitat for Braunton's milk-vetch, all construction activities are fully outside designated critical habitat. However, materials for construction of a 195-foot-tall lattice tower must be transported along access roads through critical habitat. High quality critical habitat PCEs are immediately adjacent to the unpaved roadway. Though no modifications to access roads are planned, several sharp turns in the road within critical habitat could result in construction vehicles cutting across curves and impacting roadside vegetation, including critical habitat PCEs.

Impacts to Braunton's milk-vetch designated critical habitat due to construction activities (i.e., the use of access roads) at proposed Project Site GRM would be significant.

Operational Impacts

The presence of the proposed Project facility at Site GRM would not result in impacts to designated critical habitat for Braunton's milk-vetch. The regular maintenance and operations of Project facilities (generally once a month) would require the use access roads, but heavy or large construction vehicles would not be necessary.

There would be no impact to designated Braunton's milk-vetch critical habitat or identified PCEs due to operations of the proposed Project at Site GRM.

Mitigation Measures

The following mitigation measures would be required at Site GRM and the associated access road that includes designated critical habitat for Braunton's milk-vetch (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 11** Site Access
- BIO MM 23** Prevent the Spread of Nonnative Vegetation
- BIO MM 24** Special Status Plants Surveys and Instructions

Impacts after Mitigation

With implementation mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, BIO MM 11, BIO MM 23, and BIO MM 24, use of access roads by large equipment would have oversight by the biological monitor (BIO MM 8) ensuring protection of native vegetation (BIO MM 9) and Braunton's milk-vetch critical habitat PCEs.

Proposed development at Site GRM would result in less than significant construction impacts to designated critical habitat for Braunton's milk-vetch with implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 8, BIO MM 9, BIO MM 11, BIO MM 23, and BIO MM 24.

Arroyo Toad Critical Habitat

Arroyo toads are associated with washes or intermittent streams and occupy valley foothills and desert riparian habitats, usually in small, isolated populations (USFWS 2009a). In 2001, USFWS designated critical habitat for the arroyo toad that was revised in 2005 (USFWS 2001; USFWS 2005). The following habitat features are essential to the conservation of the arroyo toad (USFWS 2005).

The PCEs for the arroyo toad consist of four components:

- 1) Rivers or streams with hydrologic regimes that supply water to provide space, food, and cover needed to sustain eggs, tadpoles, metamorphosing juveniles, and adult breeding toads. Breeding pools must persist a minimum of two months for the completion of larval

development; however, due to the dynamic nature of southern California riparian systems and flood regimes, the location of suitable breeding pools may vary from year to year. Specifically, the conditions necessary to allow for successful reproduction of arroyo toads are:

- a) Breeding pools that are less than 6 inches deep
 - b) Areas of flowing water with current velocities less than 1.3 feet per second
 - c) Surface water that lasts for a minimum of two months during the breeding season (a sufficient wet period in the spring months to allow arroyo toad larvae to hatch, mature, and metamorphose)
- 2) Riparian and adjacent upland habitats, particularly low-gradient (typically less than 6 percent) stream segments and alluvial streamside terraces with sandy or fine gravel substrates that support the formation of shallow pools and sparsely vegetated sand and gravel bars for breeding and rearing of tadpoles and juveniles; and adjacent valley bottomlands that include areas of loose soil where toads can burrow underground, to provide foraging and living areas for juvenile and adult arroyo toads
- 3) A natural flooding regime, or one sufficiently corresponding to natural, that:
- a) Is characterized by intermittent or near-perennial flow that contributes to the persistence of shallow pools into at least mid-summer.
 - b) Maintains areas of open, sparsely vegetated, sandy stream channels and terraces by periodically scouring riparian vegetation.
 - c) Also modifies stream channels and terraces and redistributes sand and sediment, such that breeding pools and terrace habitats with scattered vegetation are maintained.
- 4) Stream channels and adjacent upland habitats that allow for movement to breeding pools, foraging areas, overwintering sites, upstream and downstream dispersal, and connectivity to areas that contain suitable habitat

Critical habitat does not include man-made structures (such as buildings, aqueducts, airports, roads, and other paved areas) and the land on which they are located existing within the legal boundaries on the effective date of the critical habitat rule (USFWS 2005).

Proposed Project Site LACFCP11 is within designated critical habitat for the arroyo toad; dispersal habitat PCEs are present within the Project site. This critical habitat segment includes approximately 11 miles of the Santa Clara River corridor and the lowest segments of tributary drainages. Site LACFCP11 is located about midway along this segment of critical habitat, at a developed county facility; the proposed Project site has an existing water tank and helipad at the end of a ridgeline, above and adjacent to Soledad Canyon Road. The Santa Clara River is on the opposite side of Soledad Canyon Road. Maher Canyon, an ephemeral drainage, passes through the detention facility, crosses under Soledad Canyon Road, and joins the Santa Clara River. About 1,000 feet of Maher Canyon above Soledad Canyon Road is within critical habitat, the length of which is bordered by paved roads and structures associated with the detention facility. Upland vegetation within the study area is chamise chaparral; within the Maher Canyon drainage and Santa Clara River corridor on the opposite side of Soledad Canyon Road is mature riparian forest that includes coast live oak and California sycamore trees. This segment of the

Santa Clara River does not provide permanent flow. The river corridor has been highly degraded by heavy equipment and dumping or storage of construction materials and is used as a source of water for helicopter bucket dips from a maintained water storage tank; on the opposite side of the river corridor from Site LACFCP11 is an active railroad line.

The geographic designation of critical habitat for arroyo toad includes the Santa Clara River corridor and the lower section of Maher Canyon, completely overlapping the study area of Site LACFCP11. Technically, the existing facilities at Site LACFCP11 (water tank and helipad), detention facility roads, and structures along Maher Canyon and Soledad Canyon Road are excluded by rule as critical habitat since they are paved, man-made structures; however, activities associated with these facilities can impact the function of adjacent critical habitat.

Construction Impacts

Construction of Site LACFCP11 would not result in any impacts to or loss of wetland or riparian habitats included as PCEs for arroyo toad critical habitat. Access by construction equipment would be on existing roads that are bordered by toad habitat that meets PCE criteria, including about 5 miles of Soledad Canyon Road and the entrance road to the county facility. PCEs for upland and dispersal habitat may be impacted due to removal of some chaparral vegetation during construction of a retaining wall at the proposed Project site, and temporary trenches may be used to connect to electrical power. Construction activities including vehicle parking and turnaround areas may also result in damage to existing native vegetation and disturbance of rocks and boulders that could be used as cover by toads. Some of the vegetation that may be lost is immediately up the slope from Soledad Canyon Road, which may be a barrier to toad movements or be a source of mortality to dispersing toads. Other impacts from construction could occur as a result of erosion or transfer of sediment or pollutants into aquatic habitat. Implementation of Project BMPs (Appendix C), specifically BMPs 8 through 16, as part of the proposed Project actions would preclude transport of sediment or pollutants into aquatic habitat.

Impacts to arroyo toad critical habitat from proposed construction activities at Site LACFCP11 would be significant.

Operational Impacts

Once all construction activities are complete and any trenches, ditches, and steep-sided depressions are filled and leveled, arroyo toads may utilize the upland habitat and disperse across proposed Project Site LACFCP11 without incident. Development of Site LACFCP11 would not constitute a barrier to toad dispersal. Periodic access to the Project site by maintenance workers (about once a month) would not result in any modification of critical habitat PCEs.

There would be no operational impact to arroyo toad critical habitat at Site LACFCP11.

Mitigation Measures

The following mitigation measures would be required at Site LACFCP11 and its access road that includes designated critical habitat for arroyo toad (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 5** Hazardous Materials Management
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 11** Site Access
- BIO MM 19** Trenches and Holes Management

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 5, BIO MM 8, BIO MM 9, BIO MM 11, and BIO MM 19, the loss of perennial vegetation and disturbance to natural features would be minimized (BIO MM 9 and BIO MM 19) and overseen by a biological monitor (BIO MM 8). Potential impacts to upland habitat PCEs of arroyo toad critical habitat would be limited to the periphery of the developed site and access roads, and restricted to upland areas. The application of BIO MM 5 would protect aquatic habitats from sedimentation and spills.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 5, BIO MM 8, BIO MM 9, BIO MM 11, and BIO MM 19 at proposed Project Site LACFCP11 the proposed Project would result in less than significant impacts to arroyo toad critical habitat.

California Red-legged Frog Critical Habitat

Populations of California red-legged frogs are most likely to occur where aquatic areas used for breeding (e.g., streams, deep pools, ponds, marshes, or lagoons) are surrounded by dispersal habitat. Dispersal away from breeding sites can occur during the summer when water is scarce and frogs are seeking summer habitat (e.g., under boulders, rocks, logs, or sheds; small mammal burrows; or incised stream channels) (USFWS 2002).

Located within designated critical habitat for the California red-legged frog, Site WMP is on a high peak in the San Gabriel Mountains along Whittaker Ridge. Slopes are steep, and the vegetation is primarily recently burned chamise chaparral.

The PCEs for the California red-legged frog consist of four components (USFWS 2010a):

- 1) Aquatic Breeding Habitat. Standing bodies of fresh water (with salinities less than 4.5 parts per thousand), including natural and man-made (e.g., stock) ponds, slow-moving streams or pools within streams, and other ephemeral or permanent waterbodies that typically become inundated during winter rains and hold water for a minimum of 20 weeks in all but the driest of years
- 2) Aquatic Non-Breeding Habitat. Freshwater pond and stream habitats, as described in paragraph (1) of this entry, that may not hold water long enough for the species to complete its aquatic life cycle but which provide for shelter, foraging, predator avoidance, and aquatic dispersal of juvenile and adult California red-legged frogs. Other wetland habitats considered to meet these criteria include, but are not limited to: plunge pools within intermittent creeks, seeps, quiet water refugia within streams during high water flows, and springs of sufficient flow to withstand short-term dry periods.
- 3) Upland Habitat. Upland areas adjacent to or surrounding breeding and non-breeding aquatic and riparian habitat up to a distance of 1 mile in most cases (i.e., depending on surrounding landscape and dispersal barriers) including various vegetational series such as grassland, woodland, forest, wetland, or riparian areas that provide shelter, forage, and predator avoidance for the California red-legged frog. Upland habitat should include structural features such as boulders, rocks and organic debris (e.g., downed trees, logs), small mammal burrows, or moist leaf litter. Upland features are also essential in that they are needed to maintain the hydrologic, geographic, topographic, ecological, and edaphic features that support and surround the aquatic, wetland, or riparian habitat. These upland features contribute to: (a) Filling of aquatic, wetland, or riparian habitats; (b) Maintaining suitable periods of pool inundation for larval frogs and their food sources; and (c) Providing non-breeding, feeding, and sheltering habitat for juvenile and adult frogs (e.g., shelter, shade, moisture, cooler temperatures, a prey base, foraging opportunities, and areas for predator avoidance).
- 4) Dispersal Habitat. Accessible upland or riparian habitat within and between occupied locations within a minimum of 1 mile of each other and that support movement between such sites. Dispersal habitat includes various natural habitats, and altered habitats such as agricultural fields, that do not contain barriers (e.g., heavily traveled roads without bridges or culverts) to dispersal. Dispersal habitat does not include moderate- to high-density urban or industrial developments with large expanses of asphalt or concrete, nor does it include large lakes or reservoirs over 50 acres in size or other areas that do not contain those features identified in paragraphs above.

Critical habitat does not include man-made structures existing on the effective date of this rule and not containing one or more of the PCEs, such as buildings, aqueducts, airports, and roads and the land on which such structures are located.

USFWS has established adverse modification standards for critical habitat. These are activities that would modify critical habitat, alter PCE's, and jeopardize the continued existence of the species. These include:

- Significant alteration of water chemistry or temperatures beyond the tolerance of the species that interrupts their lifecycle
- Significant increase in sedimentation within a stream or pond that would disturb foraging and dispersal and reduce necessary habitat
- Significant alteration of channel or pond morphology that would change the hydrologic functioning of a stream or pond that would alter or degrade California red-legged frog habitat
- Eliminating upland foraging, dispersal or aestivating habitat
- Introducing, spreading, or adding to nonnative aquatic species used by the California red-legged frog
- Altering or eliminating food sources or prey base that directly or indirectly affects the California red-legged frog

Though Site WMP is located on a steep mountain peak and no aquatic/riparian habitat occurs in the study area, PCEs for California red-legged frog include upland habitat, generally within 1 mile of occupied sites. Dispersal habitat PCEs are present within the Project site. California red-legged frogs can disperse distances of up to 2 miles. Frogs are known from Piru Creek, which is more than 1 mile from Site WMP; it is unknown if frogs occur within, or have been surveyed for, in Michael Creek, a tributary of Piru Creek and less than 0.5 mile from Site WMP.

Construction Impacts

Construction of proposed Project Site WMP would not result in any impacts to or loss of wetland or riparian habitats included as PCEs for California red-legged frog critical habitat; however, red-legged frog critical habitat PCEs for upland and dispersal habitat are present. Construction activities including vehicle parking and turnaround, equipment storage and laydown for construction of a 195-foot-tall lattice may result in damage to existing native vegetation and displacement of rocks and boulders. Trenches and ditches that may compromise the suitability of critical habitat would be temporary. Since this site is along a high, steep, and exposed ridgeline, the xeric conditions would be less likely to support frogs utilizing upland habitats; however, during dispersal frogs may cross upland habitats regardless of the topography. Other impacts from construction could occur as a result of erosion or transfer of sediment or pollutants into aquatic habitat. Implementation of Project BMPs (Appendix C), specifically BMPs 8 through 16, as part of the proposed Project actions would preclude transport of sediment or pollutants into aquatic habitat.

Impacts to California red-legged frog critical habitat from construction activities associated with the proposed Project Site WMP would be significant.

Operational Impacts

Once all construction activities are complete and any trenches, ditches, and steep-sided depressions are filled and leveled, California red-legged frogs may utilize the upland habitat and disperse across

proposed Project Site WMP without incident. Development of Site WMP would not constitute a barrier to frog dispersal. Periodic access to the Project site by maintenance workers (about once a month) would not result in any modification of critical habitat PCEs.

There would be no impact to California red-legged frog critical habitat due to proposed operations at Site WMP.

Mitigation Measures

The following mitigation measures would be required at Site WMP and the access road that includes designated critical habitat for California red-legged frog (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 5** Hazardous Materials Management
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 11** Site Access
- BIO MM 19** Trenches and Holes Management

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 5, BIO MM 8, BIO MM 9, BIO MM 11, and BIO MM 19, the loss of perennial vegetation and disturbance to natural features would be minimized (BIO MM 9 and BIO MM 19) and overseen by a biological monitor (BIO MM 8). Potential impacts to upland and dispersal PCEs of California red-legged frog critical habitat would be limited to the periphery of the developed site and access roads and restricted upland areas. The application of BIO MM 5 would protect aquatic habitats from spills.

With implementation of mitigation measures BIO MM 1 through BIO MM 3, BIO MM 5, BIO MM 8, BIO MM 9, BIO MM 11, and BIO MM 19 at Site WMP the proposed Project would result in less than significant construction impacts to California red-legged frog critical habitat.

Essential Fish Habitat

Designated EFH has been established along the Pacific coastline along Los Angeles County up to the high tide line for certain marine species (e.g., groundfish [a guild of bottom-dwelling marine fishes], salmonids, pelagic species, highly migratory species). Site ZHQ and its study area are within designated

EFH. Marine environments are separated from the Project site by sand mounds and recreational beaches. Sites WS1, SCH, and LEPS are within 0.5 mile of EFH, each site being separated from the ocean by upland habitat, roadways, and, often, coastline developments. The designation of EFH primarily addresses fishing gear restrictions, restrictions on sea-bottom trawling activities, and closure of areas to all fishing that contacts the bottom. Since EFH is designated under the Magnuson-Stevens Fishery Conservation and Management Act, any project-related effects to EFH are subject to consultation with the National Marine Fisheries Service, which may provide conservation recommendations to the federal action agency.

Construction Impacts

Project activities at Site ZHQ are restricted to a paved parking lot. Noise, vibration, or the presence of people as part of construction of Site ZHQ would have no impact to designated EFH; however, sediment transport into the ocean or uncontained spills of toxic substances, should this occur, would adversely impact EFH. Implementation of Project BMPs (Appendix C), specifically BMPs 8 through 16, as part of proposed Project activities would preclude transport of sediment or toxic substances into EFH.

Impacts to groundfish from construction activities would be less than significant.

Operational Impacts

Proposed operations at the Site ZHQ would not result in any actions that could impact EFH.

There would be no impacts to EFH at Site ZHQ as a result of operational activities.

Mitigation Measures

No mitigation measures are required.

BIO-3. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Some of the most sensitive wetland habitats in Los Angeles County include vernal pools; however, this habitat does not occur within the study area of any proposed Project site. Twenty seven study areas include a wetland as mapped by the National Wetland Inventory (USFWS 2015b) (see Table 3.3-6).

Perennial water is not present at any site; however, the concrete-lined drainage channel of the San Gabriel River in a heavily urbanized setting passes within the study area of Site ASD. Water that may be present in the channel is often runoff from dense urban settings. Waterfowl and other birds and wildlife may be attracted to this source of water, though little to no native vegetation is associated with the channel. Local agencies are improving the bike path environment adjacent to canals by adding landscaping in places that someday may slightly mimic riparian habitat. Two Project sites, WS1 and ZHQ, are within 500 feet of marine habitats and beaches. Site SIM is located near a wetland mapped by the National Wetland Inventory as an ephemeral freshwater pond (this is Jaws Lake at Universal Studios).

Ephemeral drainages pass through or near the study areas of the remaining 23 sites. These wetlands and associated riparian vegetation are generally in canyons that occur below Project sites located at the top of peaks or ridges where the heads of canyons form. Site LACFCP11 is the closest of any site to mapped wetland habitats, being sited on a ridgeline just above the ephemeral Maher Canyon before its confluence with the Santa Clara River; the Santa Clara River, ephemeral in this area, is also with 500 feet of Site LACFCP11 (mostly permanent flows are found about 1 mile downstream).

Construction Impacts

At most sites, proposed ground-disturbance activities would be limited to those areas that have previously been cleared of vegetation. No proposed Project activities would occur within designated wetlands. Increased vehicle use and the presence of heavy construction equipment at a site could increase soil compaction that could result in less infiltration of water into the soil and faster flows off the site. Soil disturbance for trenching could loosen soil and allow it to be eroded and washed into ephemeral drainages at a faster rate than would occur normally. Sediment transport or uncontained spills of toxic substances, should this occur, could impact wetlands. Implementation of Project BMPs (Appendix C), specifically BMPs 8 through 16, as part of the proposed Project actions would preclude transport of sediment or toxins into aquatic habitat.

No impacts to wetlands are anticipated associated with proposed construction activities.

Operational Impacts

Upon completion of construction activities, maintenance workers would visit each Project site about once each month, which would not result in any impacts to wetlands.

No impacts to wetlands are anticipated as a result of proposed operations activities at any of the proposed Project sites.

Mitigation Measures

No mitigation measures for protection of wetlands are recommended at sites AJT, ASD, CPK, ENC1, GRM, H-17A, H-69B, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, OAT, PHN, PMT, PWT, SDW, SIM, SUN, SUN2, TOP, VPK, WS1, and ZHQ.

BIO-4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Multiple agencies and jurisdictions across Los Angeles County have recognized important wildlife habitat through special land designations or have established other land use restrictions or land use plans and policies that directly or indirectly benefit wildlife. These designations may be overlapping and often are referred to using various terminology and classifications. For example, the term “wildlife corridor” may be referred to as wildlife linkage, connectivity area, ecological area, landscape block, open space, and movement corridor. California Assembly Bill 2785 passed in 2008 required CDFW to map essential

wildlife corridors. This was accomplished through the California Essential Habitat Connectivity Project (Spencer et al. 2010) as part of the state-wide infrastructure planning process. The Los Angeles County General Plan uses the term habitat linkage and defines it as an area within the overall range of a species or suite of species that possesses sufficient cover, food, forage, water, and other essential elements to serve as a movement pathway between two or more larger areas of habitat. Depending on the species, linkages vary in size. Wildlife corridors can be applied at a landscape level or at a very fine species-specific scale, depending on the size and ecological requirements of the species being considered. For this reason, wildlife corridor boundaries have not been officially designated. Linkages are estimated wildlife routes most commonly taken between open space areas that serve as core habitat. This open space (and associated linkage zones) may include designated Natural Landscape Blocks; National Forests; Natural Community Conservation Plan/Habitat Conservation Plan areas; Significant Ecological Areas; or city, state, or national parks. Land ownership patterns, future growth predictions, and existing and planned roadways were essential considerations by Spencer et al. (2010) in determining the long-term effectiveness of wildlife movement corridors among Natural Landscape Blocks and other open space. No wildlife nurseries or colonial breeding sites were identified or recorded in the vicinity of any proposed Project site.

Most of coastal Los Angeles County is located within the planning boundaries of the South Coast Ecoregion, with a small portion of the Mojave Desert Ecoregion within Los Angeles County (Spencer et al. 2010). An ecoregion represents a natural planning unit and contains Natural Landscape Blocks, Essential Connectivity Areas, urban space, choke points, and Missing Linkages. Natural Landscape Blocks are connected by Essential Connectivity Areas. Most Natural Landscape Blocks are in mountainous areas with high biological value and conservation status. Essential Connectivity Areas are often riparian drainages and canyons connecting Natural Landscape Blocks. Missing Linkages are Essential Connectivity Areas identified in the South Coast Missing Linkage Project that have not been completely protected through land ownership. Choke points are narrow, impacted, or otherwise tenuous habitat linkages. The South Coast Ecoregion contains 116 Natural Landscape Blocks connected by 27 Essential Connectivity Areas. Native vegetation is present within 82 percent of the land in the Essential Connectivity Areas, with 12 percent of the land being urbanized and 6 percent as roadways. Because of the extensive urbanization, together with a high level of biological endemism, the South Coast Ecoregion is the most highly studied area and considered the most threatened hotspot of biodiversity in the United States, with over 400 plant and wildlife species at risk. Almost every Project site located in a non-urban area is likely to be within an open space block or wildlife movement corridor (Figure 3.3-1).

Figure 3.3-1: Natural Landscape Blocks and Potential Wildlife Movement Corridors in Project Vicinity

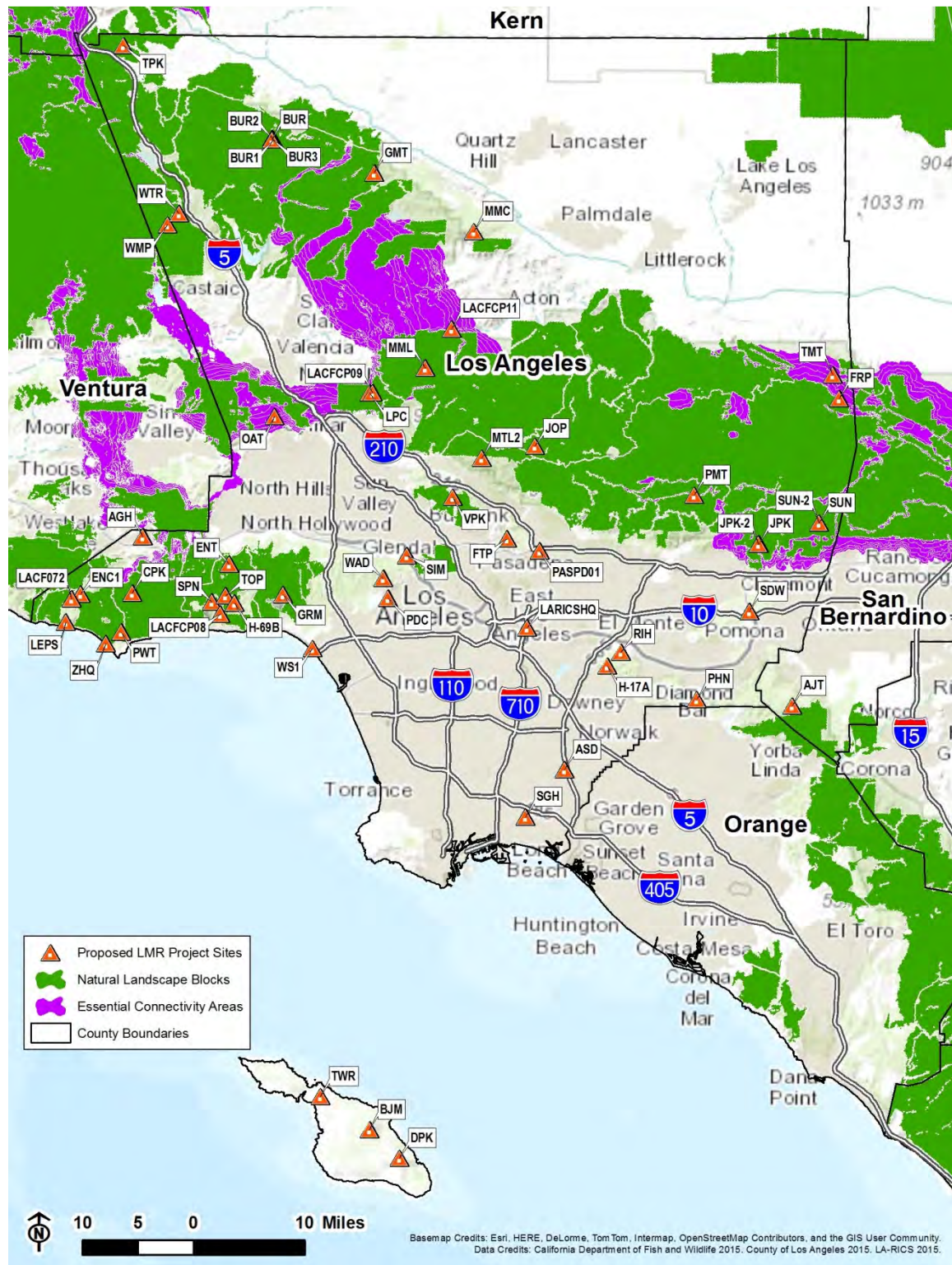


Table 3.3-10 provides a listing of land use designations, plans and delineated natural areas applicable to the management of biological resources for each Project site. The information presented in this table is relevant to this discussion under Biological Resources Significance Criteria 4 (wildlife movement), as well as Biological Resources Significance Criteria 5 (local plans and ordinances) and Biological Resources Significance Criteria 6 (HCPs). Each of these designations was considered in the landscape level analysis of potential Project impacts on wildlife movement patterns. For consistency, however, special focus was placed on the Los Angeles County General Plan that established Significant Ecological Areas (SEAs) and Coastal Resource Areas (CRAs), Missing Linkages analyzed and mapped by Penrod et al. (2001) of Southcoast Wildlands, National Forest System lands, and Natural Landscape Blocks and Essential Connectivity Areas designated by CDFW. Southern California Association of Governments (SCAG) zoned open space, parks, and wildlife preserves were considered; but these are broad designations not specific to wildlife habitat connectivity and movement.

Table 3.3-10: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
AGH	City of Agoura Hills General Plan	N/A
AJT	City of Chino Hills General Plan	N/A
ASD	City of Cerritos General Plan	N/A
BJM	Santa Catalina Island Local Coastal Program	N/A
BUR	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Liebre/Sawmill Mountains	N/A
BUR1	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Liebre/Sawmill Mountains	N/A
BUR2	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Liebre/Sawmill Mountains	N/A
BUR3	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Liebre/Sawmill Mountains	N/A
CPK	Santa Monica Mountains Local Coastal Program Essential Connectivity Area - Castro Peak/Santa Monica Mountains - Pine Mountain/Sespe Condor Wildlife Natural Landscape Block - Castro Peak/Santa Monica Mountains	N/A
DPK	Santa Catalina Island Local Coastal Program	N/A
ENC1	Santa Monica Mountains Local Coastal Program Natural Landscape Block - Zuma/Trancas Canyons/Santa Monica Mountains	N/A
ENT	City of Calabasas General Plan SCAG Zoning - Local Parks and Recreation Natural Landscape Block - Calabasas Peak/Santa Monica Mountains	N/A

Table 3.3-10: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
FRP	Angeles National Forest Land Management Plan SCAG Zoning Wildlife Preserves and Sanctuaries Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	N/A
FTP	City of Glendale General Plan	N/A
GMT	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - San Francisquito	N/A
GRM	Topanga State Park General Plan SCAG Zoning - Open Space and Recreation Natural Landscape Block - Topanga Canyon/Santa Monica Mountains	N/A
H-17A	City of Whittier General Plan SCAG Zoning - Local Parks and Recreation	N/A
H-69B	Santa Monica Mountains Local Coastal Program SCAG Zoning - Wildlife Preserves and Sanctuaries (Malibu Coastal Zone)	N/A
JOP	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Pleasant View Ridge	N/A
JPK	Angeles National Forest Land Management Plan SCAG Zoning - Open Space and Recreation Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga Natural Landscape Block - San Dimas	N/A
JPK2	Angeles National Forest Land Management Plan SCAG Zoning - Open Space and Recreation Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga Natural Landscape Block - San Dimas	N/A
LACF072	Santa Monica Mountains Local Coastal Program	N/A
LACFCP08	Santa Monica Mountains National Recreation Area General Management Plan SCAG Zoning - Beach Parks (Malibu Coastal Zone) Natural Landscape Block - Las Flores/Santa Monica Mountains	N/A
LACFCP09	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Contract Point - Santa Susana Mountains Natural Landscape Block - Contract Point	N/A
LACFCP11	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - San Gabriel Mountains West - San Francisquito	N/A
LARICSHQ	City of Monterey Park General Plan	N/A

Table 3.3-10: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
LEPS	City of Malibu Local Coastal Program	N/A
LPC	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Contract Point - Santa Susana Mountains Natural Landscape Block – Contract Point	N/A
MMC	City of Palmdale General Plan Wildlife Linkage – San Gabriels - Tehachapis (Missing Link)	West Mojave Plan
MML	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - San Gabriel Mountains West - San Francisquito Natural Landscape Block - San Gabriel Mountains West	N/A
MTL2	Angeles National Forest Land Management Plan SCAG Zoning - Open Space and Recreation, Wildlife Preserves and Sanctuaries	N/A
OAT	Los Angeles County General Plan Essential Connectivity Area - Contract Point - Santa Susana Mountains	N/A
PASPD01	City of Pasadena General Plan	N/A
PDC	City of West Hollywood General Plan	N/A
PHN	Los Angeles County General Plan SCAG Zoning - Open Space and Recreation Wildlife Linkage – Puente Chino Hills (Choke point)	N/A
PMT	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga Natural Landscape Block - San Gabriel/Cucamonga	N/A
PWT	Santa Monica Mountains National Recreation Area General Management Plan SCAG Zoning - Open Space and Recreation Natural Landscape Block - Zuma/Trancas Canyons/Santa Monica Mountains	N/A
RIH	Los Angeles County General Plan SCAG Zoning - Hacienda Heights Local Parks and Recreation	N/A
SDW	City of San Dimas General Plan	N/A
SGH	City of Signal Hill General Plan	N/A
SIM	Los Angeles County General Plan	N/A
SPN	Santa Monica Mountains Local Coastal Program	N/A
SUN	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga Natural Landscape Block - San Dimas	N/A
SUN2	Angeles National Forest Land Management Plan	N/A

Table 3.3-10: Plans and Relevant Land Use Designations for Protection of Biological Resources

Site	Local Plans Affecting Biological Resources	HCP/NCCP
	SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga Natural Landscape Block - San Dimas	
TMT	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	N/A
TOP	Santa Monica Mountains Local Coastal Program Natural Landscape Block - Calabasas Peak/Santa Monica Mountains	N/A
TPK	Los Angeles County General Plan SEA - San Andreas Natural Landscape Block - Oso Canyon	N/A
TWR	Santa Catalina Island Local Coastal Program	N/A
VPK	City of Glendale General Plan SCAG Zoning - Local Parks and Recreation Natural Landscape Block - Verdugo Mountains	N/A
WAD	City of Beverly Hills General Plan	N/A
WMP	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Pine Mountain/Sespe Condor	N/A
WS1	City of Santa Monica General Plan	N/A
WTR	Angeles National Forest Land Management Plan SCAG Zoning - Wildlife Preserves and Sanctuaries Natural Landscape Block - Pine Mountain/Sespe Condor	N/A
ZHQ	City of Malibu Local Coastal Program	N/A
Geographical Information System Sources (Search distances): General Plans – Sites within jurisdictional boundary HCP/NCCP – Habitat Conservation Plans/Natural Community Conservation Planning for sites within planning boundary Los Angeles County – Sites located within jurisdictional boundary Missing Linkages – Sites located within 1 mile of general boundary Natural Landscape Blocks/Essential Connectivity Areas – Sites located within the “soft” boundary NPS – National Park Service for sites within jurisdictional boundary SCAG – Southern California Association of Governments for sites located within jurisdictional boundary SEA/CRA – Significant Ecological Areas/Coastal Resource Areas for sites located within 500 feet of boundary USFS – U.S. Forest Service sites located within jurisdictional boundary		

Natural Landscape Blocks and Essential Connectivity Areas

Natural Landscape Blocks and Essential Connectivity Areas were identified by the CDFW during the California Essential Habitat Connectivity Project (Spencer et al. 2010) (Figure 3.3-1). These areas are not jurisdictional boundaries and were created at a broad scale for the purpose of general planning level analysis. National Forest System Lands constitute the core of these landscape blocks. Natural Landscape Blocks and Essential Connectivity Areas were scored based on ecological integrity using the ecological condition index (Spencer et al. 2010). The index scores resource quality at 100-meter resolution, using the following components: land conversion, residential housing impact, road effects, and forest structure. Other important factors, including conservation status (protected lands), known high biological value, and ecoregion variability, were considered in the final index value. The ecological condition index is scaled from 0 to 100, with higher numbers correlating to better ecological conditions.

The South Coast region is a very high-contrast landscape, with the Natural Landscape Blocks located in rugged, mountainous areas separated by dense urbanization and agricultural lands. Natural Landscape Blocks and Essential Connectivity Areas in the South Coast ecoregion have the lowest average ecological condition index ratings, 52 and 26 respectively, of all the ecoregions in California. Due to the large human population and intense urbanization, the Essential Connectivity Areas in the ecoregion include some of the least natural areas in the state, as well.

Essential Connectivity Areas are extremely important in supporting wildlife movement across regions, thus maintaining genetic diversity in certain species' populations. Proposed Project sites located within identified Essential Connectivity Areas are presented in Table 3.3-11.

Table 3.3-11: Proposed Project Sites Located within Essential Connectivity Areas

Essential Connectivity Area (ECA)	Proposed Project Site(s)	Geographical Connectivity	Ecological Condition Index
Castro Peak/Santa Monica Mountains - Pine Mountain/Sespe Condor (119,050 acres)	CPK	Connects Santa Monica Mountains at Castro Peak northward through Simi Hills to Santa Susana Mountains and Topatopa Mountains (Pine Mountain). Four major roads intersect this ECA.	23
Contract Point - Santa Susanna Mountains (29,349 acres)	LACFCP09, LPC, OAT	Connects the Santa Susanna Mountains eastward to the San Gabriel Mountains through Contract Point. Three major roads intersect this ECA; numerous threats associated with land ownership patterns and oil and gas drilling.	14
San Gabriel Mountains West - San Francisquito (98,705 acres)	LACFCP11, MML	Connects San Gabriel Mountains through Soledad Canyon Northwest to Liebre/Sawmill Mountains. One major road intersects this ECA.	43
Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	FRP, JPK, JPK2, PMT,	Connects San Gabriel Mountains from Pleasant View Ridge eastward through Table Mountain	51

Table 3.3-11: Proposed Project Sites Located within Essential Connectivity Areas

Essential Connectivity Area (ECA)	Proposed Project Site(s)	Geographical Connectivity	Ecological Condition Index
(289,348 acres)	SUN, SUN2, TMT	to San Bernardino Mountains. Five major roads intersect this ECA.	

Twenty-six proposed Project sites are located across 15 Natural Landscape Blocks, described in more detail below.

Calabasas Peak/Santa Monica Mountains Natural Landscape Block

Sites ENT and TOP are found within the 13,100-acre Calabasas Peak/Santa Monica Mountains Natural Landscape Block. It is in the South Coast Ecoregion and includes portions of the Los Angeles River and Santa Monica Bay watersheds. This landscape block overlaps the ranges of approximately 276 amphibian, reptile, mammal, and bird species and has a very low ecological condition index rating of 6. Approximately 12 CNDDDB special animal species have been reported in this block.

Castro Peak/Santa Monica Mountains Natural Landscape Block

Site CPK is located within the 19,846-acre Castro Peak/Santa Monica Mountains Natural Landscape Block. It is in the South Coast Ecoregion and falls within the Santa Monica Bay watershed, which overlaps the ranges of approximately 277 amphibian, reptile, mammal, and bird species and has a relatively low ecological condition index rating of 24. Approximately 14 CNDDDB special animal species have been reported in this block.

Contract Point Natural Landscape Block

Sites LACFCP09 and LPC are located within the 9,714-acre Contract Point Natural Landscape Block. It is in the South Coast Ecoregion and falls within the Los Angeles River and Santa Clara–Calleguas watersheds. This landscape block overlaps the ranges of approximately 268 amphibian, reptile, mammal, and bird species and has a relatively high ecological condition index rating of 86. Approximately three CNDDDB special animal species have been reported in this block.

Las Flores/Santa Monica Mountains Natural Landscape Block

Site LACFCP08 is within the 3,465-acre Las Flores/Santa Monica Mountains Natural Landscape Block. It is in the South Coast Ecoregion and falls within the Santa Monica Bay watershed. The ranges of approximately 302 amphibian, reptile, mammal, and bird species overlap this block; and it has a relatively low ecological condition index rating of 17. Approximately four CNDDDB special animal species have been reported in this block.

Liebre/Sawmill Mountains Natural Landscape Block

The four Project sites within the Liebre/Sawmill Mountains Natural Landscape Block (BUR, BUR1, BUR2, and BUR3) are located at the same mountaintop communications site complex, and only one would be constructed (the other three being alternate sites). The 93,328-acre Liebre/Sawmill Mountains Natural Landscape Block is located in the South Coast and Mojave Desert ecoregions and falls within the Antelope and Santa Clara–Calleguas watersheds. This block overlaps the ranges of approximately 242 amphibian, reptile, mammal, and bird species and has a high ecological condition index rating of 92. Approximately 11 CNDDDB special animal species have been reported in this block.

Oso Canyon Natural Landscape Block

Site TPK is located within the 13,916-acre Oso Canyon Natural Landscape Block. It is in the South Coast and Mojave Desert ecoregions and falls within the Antelope, Grapevine, and Santa Clara–Calleguas watersheds. The block overlaps the ranges of approximately 266 amphibian, reptile, mammal, and bird species and has a high ecological condition index rating of 89. Approximately seven CNDDDB special animal species have been reported in this block.

Pine Mountain/Sespe Condor Natural Landscape Block

Sites WMP and WTR are located within the 437,040-acre Pine Mountain/Sespe Condor Natural Landscape Block. It is in the South Coast Ecoregion and includes portions of the Grapevine, Santa Clara–Calleguas, Santa Maria, and Ventura River watersheds. This block overlaps the ranges of approximately 246 amphibian, reptile, mammal, and bird species; and it has a high ecological condition index rating of 93. Approximately 19 CNDDDB special animal species have been reported in this block.

Pleasant View Ridge Natural Landscape Block

Site JOP is located within the 97,425-acre Pleasant View Ridge Natural Landscape Block. It is in the South Coast and Mojave Desert ecoregions and spans across the Antelope, Los Angeles River, San Gabriel River, and Santa Clara–Calleguas watersheds. The block overlaps the ranges of approximately 257 amphibian, reptile, mammal, and bird species and has a relatively high ecological condition index rating of 86. Approximately 11 CNDDDB special animal species have been reported in this block.

San Dimas Natural Landscape Block

Sites JPK, JPK2, SUN, and SUN2 are located within the 25,420-acre San Dimas Natural Landscape Block. This block is in the South Coast ecoregion and falls within the San Gabriel River and Santa Ana River watersheds. This block falls within the ranges of approximately 272 amphibian, reptile, mammal, and bird species and has a moderate to high ecological condition index rating of 75. Approximately nine CNDDDB special animal species have been reported in this block.

San Francisquito Natural Landscape Block

Site GMT is located within the 30,354-acre San Francisquito Natural Landscape Block. It is in the South Coast ecoregion and falls within the Santa Clara–Calleguas watershed. The ranges of approximately 237

amphibian, reptile, mammal, and bird species overlap this area; and it has a high ecological condition index rating of 87. Approximately five CNDDDB special animal species have been reported in this block.

San Gabriel Mountains West Natural Landscape Block

Site MML is located in the 94,584-acre San Gabriel Mountains West Natural Landscape Block. It is in the South Coast Ecoregion and spans the Los Angeles River and Santa Clara-Calleguas watersheds. The ranges of approximately 274 amphibian, reptile, mammal, and bird species overlap this block; and it has a high ecological condition index rating of 91. Approximately 11 CNDDDB special animal species have been reported in this block.

San Gabriel/Cucamonga Natural Landscape Block

Site PMT is located within the 241,279-acre San Gabriel/Cucamonga Natural Landscape Block. It is in the South Coast and Mojave Desert ecoregions and includes portions of the Antelope, Los Angeles River, Mojave, San Gabriel River, and Santa Ana River watersheds. It overlaps the ranges of approximately 261 amphibian, reptile, mammal, and bird species; and it has a high ecological condition index rating of 88. Approximately 22 CNDDDB special animal species have been reported in this block.

Topanga Canyon/Santa Monica Mountains Natural Landscape Block

Site GRM is located within the 20,042-acre Topanga Canyon/Santa Monica Mountains Natural Landscape Block, which is in the South Coast ecoregion and falls within the Los Angeles River and Santa Monica Bay watersheds. The block overlaps the ranges of approximately 275 amphibian, reptile, mammal, and bird species and has a moderate ecological condition index rating of 47. Approximately five CNDDDB special animal species have been reported in this block.

Verdugo Mountains Natural Landscape Block

Site VPK is located within the 7,265-acre Verdugo Mountains Natural Landscape Block. It is in the South Coast ecoregion and is located in the Los Angeles River watershed. This block overlaps the ranges of the approximately 230 amphibian, reptile, mammal, and bird species. It has the lowest possible ecological condition index rating of 0. The ecological condition index score is likely a model error and a direct result of the small size of the block and the surrounding urbanization and development on all sides, which is skewing the Index model's results. In this case, the score should be considered inaccurate and is likely not a completely accurate representation of the on-site conditions. One CNDDDB special animal species has been reported.

Zuma/Trancas Canyons/Santa Monica Mountains Natural Landscape Block

Sites ENC1 and PWT are located within the 10,129-acre Zuma/Trancas Canyons/Santa Monica Mountains Natural Landscape Block. It is in the South Coast ecoregion and is in the Santa Monica Bay watershed. The block overlaps with the ranges of approximately 297 amphibian, reptile, mammal, and bird species and has a low to moderate ecological condition index rating of 39. Approximately four CNDDDB special animal species have been reported in this block.

Significant Ecological Areas

Site TPK is located in unincorporated Los Angeles County within a Los Angeles County-designated SEA (the San Andreas SEA). SEAs often provide core habitat to support wildlife movement within large open spaces, within bottleneck areas surrounded by urban development, and within fragmented landscapes of scattered open space within rural settings.

Wildlife Linkages

Wildlife Linkages were identified during a multi-agency, multi-disciplinary workshop in 2000 entitled “Missing Linkages: Restoring Connectivity to the California Landscape” (Penrod et al. 2001). Critical at-risk habitat linkages were mapped throughout the state. Two proposed Project sites are located within 1 mile of identified wildlife linkages corridors.

The San Gabriels-Tehachapis Wildlife Linkage is identified as a “missing linkage” that would connect the San Gabriel Mountains to the north across Mojave Desert habitat in the Antelope Valley to the Tehachapi Mountains. This corridor is listed as a missing linkage because the Antelope Valley is primarily private property, and most of the native vegetation has been removed for farming. This potential wildlife corridor is identified for general wildlife and birds, but its future is not protected. Site MMC is located on the north/northeast side of the San Gabriel Mountains at the southern end of the identified missing linkage and within a large open space landscape block.

The Puente-Chino Hills Wildlife Linkage provides fragile connections for wildlife across a landscape of scattered open space. The continued presence of large mammals is dependent on retaining linkage corridors among the open space blocks. This area is considered a choke point where opportunities for wildlife movement across the landscape are limited. Site PHN is located at an abandoned Nike missile site near the interface between expansive urban development and open space within the Puente Hills SEA. Site PHN is surrounded by nonnative grassland with scattered woodlands on north facing slopes. A water tank and communications tower is within a paved and fenced enclosure; access is by a gated, asphalt road. The SEA and wildlife corridor consists of a series of relatively small open spaces with limited linkages (i.e., missing links) and wildlife movement choke points.

Wildlife Nursery Sites

No occurrences of wildlife nursery sites or colonial bird nesting sites are recorded in the CNDDDB within 1 mile of any Project site.

Construction Impacts

All proposed Project sites are located within existing developments that may include water tanks, communications towers, or other facilities; existing access roads are present at each site. At almost all sites, site development would be within the existing disturbance footprint, with minimal (if any) loss of native vegetation. Construction activities at a site would be completed in about six weeks.

Proposed construction activities at Project sites may cause temporary impacts to wildlife movements (including deer, mountain lion, small mammals, reptiles, birds, and insects) in the vicinity of a site due to increased human presence and noise associated with construction activities. These impacts would be minor since it would be within the normal behavior patterns of the animal to avoid areas of localized disturbance by continuing travels by an alternate path. Open trenches could temporarily impede small mammals, reptiles, and ground-dwelling insects moving within or through the site. Increased use of roads, even on a temporary basis for construction-related activities, could impede or cause injury/mortality to various species of wildlife. However, at each site where habitat connectivity may be a concern, the existing and proposed facilities represent a small point within a larger landscape having extensive opportunity for wildlife to move around the facility. Development of Site PHN in association with the existing facilities at the Puente-Chino Hills Wildlife Linkage neither contributes to nor resolves the issues associated with this missing linkage. Construction of Project facilities may have temporary (up to six weeks) and minor effects to wildlife movement on a very fine scale but would have no impact at a landscape level.

There would be less than significant impacts to wildlife movement corridors and habitat linkage areas due to construction of proposed Project facilities at sites CPK, FRP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MML, OAT, PMT, SUN, SUN2, and TMT.

Operational Impacts

Due to development of Project facilities at existing sites, resulting impacts to movement of wildlife across the landscape would be minimal. Upon completion of construction activities, Project sites may be visited by maintenance personnel approximately once a month, with minimal disturbance to resident or migratory wildlife along roadways or at the site. The presence of new towers, extending up to 180 feet, may contribute to mortality of birds passing through the area, especially during nighttime migration; however, this would not constitute a barrier to bird migration across the landscape. This potential mortality is considered minimal because the proposed lattice towers or monopoles would not have guy lines—the causative factor for most avian mortality at communication sites. Flashing lights may occur on some towers if required by FAA; however, flashing lights are less of an attractant to nighttime migrating birds than steady lights, resulting in a reduction in avian mortality due to collision.

Additionally, operations would not result in a reduction to the ecological condition index rating identified for sites located within Natural Landscape Blocks and Essential Connectivity Areas. Parameters considered in the index model include land conversion, residential housing impacts, road effects, and forest structure within forested areas, none of which will be altered due to Project activities. Land will not be converted from a natural use to a developed use, additional housing will not be created, existing roads will not be upgraded in road-class, and a minimal amount of natural vegetation (if any) will be removed without causing any change in forest stand structure or condition.

Impacts to wildlife movement corridors and habitat linkage areas due to operations of proposed Project facilities would be less than significant.

Mitigation Measures

Although impacts from construction and operations activities to wildlife movement corridors and habitat linkage areas would be less than significant without application of mitigation measures, to further reduce the already less than significant impacts, the following measures would still apply at sites CPK, LACFCP09, LPC, OAT, LACFCP11, MML, FRP, JPK, JPK2, PMT, SUN, SUN2, and TMT. Each of these sites is within 1 mile of Essential Connectivity Areas, which are extremely important in supporting wildlife movement across regions (mitigation measures previously described are listed by name only):

- BIO MM 1** Mitigation Monitoring and Reporting Plan
- BIO MM 2** Worker Environmental Awareness Program
- BIO MM 3** Biological Compliance Reporting
- BIO MM 4** Site Sanitation
- BIO MM 5** Hazardous Materials Management
- BIO MM 8** Biological Monitoring
- BIO MM 9** Protect Native Vegetation and Common Wildlife
- BIO MM 10** No Pets
- BIO MM 11** Site Access
- BIO MM 19** Trenches and Holes Management

Impacts after Mitigation

With the implementation of mitigation measures BIO MM 1 through BIO MM 5, BIO MM 8 through BIO MM 11, and BIO MM 19 at sites CPK, LACFCP09, LPC, OAT, LACFCP11, MML, FRP, JPK, JPK2, PMT, TMT, SUN, and SUN2, wildlife movement across the landscape would not be impeded by the proposed Project. Mitigation measures provide for the protection of native vegetation and wildlife habitats (BIO MM 8); keeping each site free of trash, discarded food, and other items that may compromise wildlife (BIO MM 4); controlling hazardous substances (BIO MM 5); and providing oversight by a biological monitor (BIO MM 8).

Although the addition of a new communications tower or monopole, even where towers or monopoles already exist, could contribute to avian mortality, each proposed Project site is in conjunction with existing development and would not alter the character of the open space or otherwise exacerbate the existing challenges for wildlife movements. No occurrences of wildlife nursery sites or colonial bird nesting sites are recorded in the CNDDDB within 1 mile of any Project site. Therefore, the development of the proposed Project sites would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors

and would not impede the use of native wildlife nursery sites. Implementation of mitigation measures BIO MM 1 through BIO MM 5, BIO MM 8 through BIO MM 11, and BIO MM 19 at sites CPK, LACFCP09, LPC, OAT, LACFCP11, MML, FRP, JPK, JPK2, PMT, TMT, SUN, SUN2 would further reduce the less than significant impacts related to the construction and operations of the proposed Project to wildlife movement area and habitat linkages.

BIO-5. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project area includes several jurisdictions that regulate biological resources. These include federal, state, county, conservancy, and incorporated city jurisdictions. Management of biological resources varies with each of the 54 sites, as does the existence of managed resources. As such, the potential for conflict with local policies or ordinances that protect these resources varies by site and is discussed below.

Four sites occur within jurisdictions with land use plans that do not have specific policies or ordinances protecting biological resources. In each of these instances, because there are no local ordinances or policies protecting biological resources, no conflict would occur; and these sites are not discussed further. These four sites include:

ASD	LARICSHQ	PDC	SGH
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Five sites occur within jurisdictions that have specific policies or ordinances protecting biological resources; however, no biological resources are present at these sites that are protected by these local ordinances or policies; therefore, no conflicts would occur, and these sites are not discussed further. These five sites include:

MMC	PASPD01	SIM	WAD	WS1
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Development of the following 45 proposed Project sites has the potential to impact biological resources protected by local policies or ordinances:

AGH	AJT	BJM	BUR	BUR1
BUR2	BUR3	CPK	DPK	ENC1
ENT	FRP	FTP	GMT	GRM
H-17A	H-69B	JOP	JPK	JPK2
LACF072	LACFCP08	LACFCP09	LACFCP11	LEPS
LPC	MML	MTL2	OAT	PHN
PMT	PWT	RIH	SDW	SPN
SUN	SUN2	TOP	TMT	TPK
TWR	VPK	WMP	WTR	ZHQ

The applicable plans potentially affected at these sites include a two federal land management plans (for the Angeles National Forest and the SMMNRA), a state park plan, local coastal programs in the City of Malibu, the County of Los Angeles (Santa Monica Mountains and Santa Catalina Island), the Los Angeles County General Plan, and the City of Chino Hills General Plan. These plans are not subject to intergovernmental immunity. Following discussion of these applicable plans is a discussion of impacts that could occur at sites within incorporated cities in Los Angeles County that do not have an applicable policy or ordinance.

A discussion of underlying local plans and ordinances that affect biological resources associated with these sites is provided below.

Angeles National Forest Land Management Plan – Sites BUR, BUR1, BUR2, BUR3, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, SUN, SUN2, TMT, WMP and WTR

Sites located in the Angeles National Forest are under the administration of the U.S.D.A. Forest Service and subject to the Land Management Plan (LMP) for the Angeles National Forest (USDA 2006). Included in the Strategic Goals are several goals applicable to biological resources. These include:

- Goal: 2.1 – Reverse the trend of increasing loss of natural resource values due to invasive species.
- Goal 6.2 – Provide ecological conditions to sustain viable populations of native and desired nonnative species.

Construction Impacts

Final determinations of consistency with the Angeles National Forest LMP would be made by the U.S.D.A. Forest Service.

Construction activities could result in ground disturbance which could increase the potential for introduction of invasive species, as identified in Impact BIO 1. This would be in conflict with Goal: 2.1 of the Angeles National Forest LMP. The impact of introduction of weedy species into the forest is considered significant.

Construction activities at several proposed Project sites in the Angeles National Forest were determined to have the potential to impact species, which would be a conflict with Goal 6.2 of the Angeles National Forest LMP. The site-specific impact analysis showed impacts ranging up to significant. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Mitigation Measures

Implementation of BIO MM 23, Prevent the Spread of Nonnative Vegetation, would be required at all sites on the Angeles National Forest.

Mitigation measures for potential for impacts to species and habitat are identified for each of the sites on the Angeles National Forest in Impact BIO 1.

Impacts After Mitigation

Implementation of the BIO MM 23 would reduce the potential for spread of weeds on the forest, thereby reducing conflicts with Goal 2.1. Impacts would be reduced to less than significant.

As described under Impact BIO 1, all impacts to species identified on the forest would be reduced to less than significant with implementation of mitigation. As a result, conflicts with Goal 6.2 would be reduced. Impacts would be reduced to less than significant.

Operational Impacts

Operations would not introduce weedy species into the forest, nor impact species or habitat. No conflict with the Angeles National Forest LMP has been identified, therefore no impact would occur.

Mitigation Measures

No mitigation measures are required.

Santa Monica Mountains National Recreation Area General Management Plan - Sites LACFCP08 and PWT

Two sites, LACFCP08 and PWT, are under National Park Service administration in the SMMNRA. Resource management goals included in the SMMNRA GMP include protecting and enhancing species, habitat diversity and natural processes, and eradicating alien plant species.

Construction Impacts

Final determinations of consistency with the SMMNRA GMP would be made by the National Park Service.

Implementation of the proposed Project may conflict with the goals of the GMP, specifically protecting and enhancing species and habitat diversity and eradication of alien plant species.

Construction activities at sites LACFCP08 and PWT were determined in Impact BIO 1 to have the potential to impact species, which would be a conflict with the SMMNRA GMP goal to protect species and habitat diversity. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Construction activities could result in in ground disturbance which could increase the potential for introduction of invasive species, as identified in Impact BIO 1. This would be in conflict with the GMP goal to eradicate alien plant species. The impact of introduction of weedy species into the SMMNRA is considered significant.

Mitigation Measures

Mitigation measures for potential for impacts to species and habitat are identified for each of the sites on the SMMNRA in Impact BIO 1.

Implementation of BIO MM 23, Prevent the Spread of Nonnative Vegetation, would be required at sites LACFCP08 and PWT.

Impacts After Mitigation

Implementation of the BIO MM 23 would reduce the potential for spread of weeds, thereby reducing conflicts with the GMP goal to eradicate alien plant species. Impacts would be reduced to less than significant.

As described under Impact BIO 1, all impacts to species at sites LACFCP08 and PWT would be reduced to less than significant with implementation of mitigation. As a result, conflicts with the GMP goal to protect species and habitat diversity would be reduced. Impacts would be reduced to less than significant.

Operational Impacts

Operations would not introduce weedy species or substantially impact native species or habitat diversity in the SMMNRA. No conflict with the SMMNRA GMP has been identified, therefore no impact would occur.

Mitigation Measures

No mitigation measures are required.

Topanga State Park General Plan- Site GRM

Site GRM lies in Topanga State Park and would be subject to the Topanga State Park General Plan (California State Parks [CSP] 2012), which contains goals and guidelines for the management of natural resources within the park. Site GRM is located on a previously disturbed site that is bordered by dirt roads and contains one existing lattice tower, but also contains native vegetation.

Construction Impacts

Construction activities may remove chaparral vegetation which could increase the likelihood for exotic plants to occupy the site. Additionally, the site is adjacent to critical habitat for the special status Braunton's milk-vetch. Construction activities may have significant impacts on biological resources protected under the Topanga State Park General Plan, resulting in conflicts with guidelines that protect sensitive plant species, wildlife, and sensitive wildlife. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Operation Impacts

With the placement of an additional communication tower at a Project site, the new structure increases the probability of a bird strike hazard, even if other towers are present. Permanent removal of vegetation decreases, although minimally, the size of habitat available for protected biological resources. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur

approximately once a month; this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, however, without impacts at a landscape level. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities, and so would not change the character or magnitude of existing impacts. Due to the potential for protected species in nearby areas, operations of the proposed Project could have a significant impact on biological resources protected by the Plan.

Mitigation Measures

Mitigation measures to reduce construction and operations impacts associated with conflicts with the Topanga State Park General Plan are provided in Table 3.3-12.

Impacts after Mitigation

With the implementation of the mitigation measures identified in Table 3.3-12, the proposed Project would have a less than significant impact on biological resources protected by the Topanga State Park General Plan.

Santa Catalina Island Local Coastal Plan - Sites BJM, DPK, and TWR

Sites BJM, DPK and TWR are owned by the Santa Catalina Islands Conservancy, a private non-profit entity; therefore, the ESHA-level protection afforded in the Local Coastal Plan is considered applicable to these sites. Site DPK is located adjacent to an existing lattice tower and contains coastal sage scrub and chaparral vegetation. Site BJM is located on a leveled hilltop that is predominantly paved and has an existing communication tower. Site TWR is located on a peak with existing communications facilities, surrounded by disturbed coastal sage scrub.

Construction Impacts

Construction activities could include removal of vegetation, which would temporarily degrade habitat values in ESHAs, in conflict with California PRC 30240. Conflict with this underpinning of ESHA protection contained in the Santa Catalina Island Local Coastal Plan would constitute a significant impact. Workers bringing pets to the site could result in an increase in feral mammal populations, creating a conflict with Policy 3. Although this is not considered likely, it could be significant if feral populations were established or increased on Santa Catalina Island. BMPs in place for the Project are the procedures designed to minimize erosion; therefore, the proposed activity is considered consistent with Policy 11. There is a potential to increase nonnative vegetation to the site during construction, resulting in a potential for conflict with Policy 20, and thus result in a significant impact. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Operation Impacts

Sites BJM, DPK, and TWR are existing communications facilities. Maintenance, repair, and operations at the sites are not expected to result in effects to habitat at sites BJM, DPK, and TWR. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities, and so

would not change the character or magnitude of existing impacts. Operations at these three sites would not be in conflict with existing policies or ordinances; therefore, any impacts would be less than significant.

Mitigation Measures

Mitigation measures that would be implemented to reduce impacts on biological resources at sites BJM, DPK, and TWR are provided in Table 3.3-12.

Impacts after Mitigation

Implementation of the mitigation measures provided in Table 3.3-12 would reduce or eliminate significant reduction of habitat values, prevent the release of stray pets, prevent erosion, and prevent introduction of nonnative species to the areas at and surrounding sites BJM, DPK, and TWR. With the implementation of the above mitigation measures, the proposed Project will have a less than significant impact on biological resources protected by the Santa Catalina Island Coastal Plan and the Los Angeles County General Plan at these sites.

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Program - Sites CPK, ENC1, H-69B, LACF072, SPN, and TOP

Sites CPK, ENC1, H-69B, LACF072, SPN, and TOP would be subject to the Santa Monica Mountains LCP Land Use Plan and Local Implementation Program (LIP). Map 2, Biological Resources of the land use plan identifies at a landscape level, Significant Ecological Resource Areas (SERAs) where development is either prohibited or strictly regulated. Based on a review of Map 2, Biological Resources of the Santa Monica Mountains Land Use Plan, it appears that portions of at least four sites could contain H1 or H2 habitat. Habitat at each of the six sites, as designated on Map 2, is discussed below.

- Most of Site CPK comprises H3 Habitat, although a small area within the eastern site boundary of Site CPK is designated as H2 Habitat. The larger study area for Site CPK includes an H1 Quiet Zone.
- Site ENC1 contains H3 Habitat but also contains H1 Habitat, H2 High Scrutiny Sub-Area Habitat, and H1 Quiet Zone. The larger study area for Site ENC1 also includes H1 Habitat.
- Most of Site H-69B is delineated as H3 Habitat, but the north portion of the site includes H2 Habitat. The study area surrounding Site H-69B includes H1 Habitat and H1 Quiet Zone.
- Most of Site LACF072 contains H3 Habitat, but a small portion in the southwestern side of Site LACF072 contains H2 Habitat. The northern portion of the study area for Site LACF072, across from Decker Canyon Road, as well as a small portion of the southwest border, is designated as H2 Habitat.
- Site SPN contains only H3 Habitat; the study area for Site SPN includes H2 Habitat and an H1 Quiet Zone.

- Site TOP contains only H3 Habitat; the study area for Site TOP includes H2 Habitat and an H1 Quiet Zone.

Construction Impacts

With very limited exceptions, development in and adjacent to H1 Habitat is prohibited. These exceptions include resource-dependent activities (e.g., low-impact campgrounds and trails for non-motorized use), public works projects required to protect existing public roads (where no alternative is feasible and where impacts are mitigated), and for access roads to lawfully permitted new development that meet specific criteria. New development or disturbance of H2 Habitat is also strictly regulated, with mitigation requirements identified for some limited allowable uses. Areas designated as H3 Habitat can be developed with certain restrictions, including a requirement to preserve native vegetation on site.

Although many of the above sites have areas designated as H1, H2, or H2 High Scrutiny Habitat, site-specific conditions including existing development and disturbance occur at each of the sites, essentially removing specific portions of the site (i.e., those not containing native vegetation meeting the criteria of H1 or H2 Habitat). Additionally, nearly all sites adjoin H1, H2, or H2 High Scrutiny Sub-Area Habitat; and development of areas adjacent to these SERAs is strictly regulated.

Activities associated with proposed construction at proposed Project sites within or adjacent to H1, H2, or H2-High Scrutiny Sub-Area Habitat (i.e., SERAs) may be prohibited by and are therefore in conflict with the Santa Monica Mountains LCP Land Use Plan policies CO-40, CO-41, CO-42, and CO-44. Because development at sites CPK, ENC1, H-69B, LACF072 (because on-site SERAs occur), and all sites (because adjacent SERAs occur) would potentially impact resources protected by these policies, there is a potential for conflict with these policies. As development at these sites would impact underlying resources, this is considered a significant impact.

Development within sites containing H3 Habitat could occur, although impacts to existing native vegetation within H3 Habitat would constitute a conflict with Policy CO-44, which requires in-site development to avoid sensitive biological resources where these occur. The potential for construction impacts at these sites is discussed in Section 3.3.4.1 BIO-1 Impact Analysis and BIO-2 Impact Analysis. Construction impacts at sites CPK, ENC1, H-69B, LACF072, SPN, and TOP would be in conflict with this policy. As a result of impact to the underlying resources protected by this policy, this would in turn constitute a significant impact.

Operation Impacts

With the placement of an additional communications tower at a Project site, the new structure increases the probability of a bird strike hazard, even if other towers are present. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur approximately once a month; this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, however, without impacts at a landscape level. In addition, the Project site

development would be within, or involve a slight expansion of, existing facilities and so would not change the character or magnitude of existing impacts. Due to the proximity to designated SERAs, operations of the proposed Project could have a significant impact on biological resources protected by the Plan.

Mitigation Measures

Mitigation measures that would be implemented to reduce impacts on biological resources at sites CPK, ENC1, H-69B, LACF072, SPN, and TOP are provided in Table 3.3-12.

Impacts after Mitigation

Substantial disturbed vegetation and developed areas within individual proposed Project sites are available for development. Using the measures identified in Table 3.3-12 to avoid destruction or disturbance of native vegetation would preclude disturbance to native vegetation and would help to prevent conflicts with the Santa Monica Mountains LCP Land Use Plan policies. As a result, with mitigation, impacts associated with construction at sites CPK, ENC1, H-69B, LACF072, SPN, and TOP would be less than significant.

City of Malibu Local Coastal Program Land Use Plan and Local Implementation Program, City of Malibu General Plan – Sites LEPS and ZHQ

Sites LEPS and ZHQ are within the corporate limit of the City of Malibu. Biological resources there are managed under the City of Malibu LCP, Land Use Plan, LIP, and the City of Malibu General Plan. Goal 3.4.1 of the General Plan is to protect and preserve natural resources through policies such as minimizing disruptions to ecologically sensitive lands, wildlife linkages, and disturbed sensitive resource areas; protect and preserve the ecosystems of the Santa Monica Mountains and adjacent coastline; and reclaim Malibu's threatened natural resources including the beaches, wildlife, plant life, and their habitats. A western portion of the study area for Site ZHQ (but not the site proper) covers the Malibu coastline and the Pacific Ocean, which is an ESHA under the Plan. Additionally, critical habitat for the western snowy plover is located within the study area and abuts the proposed Project site. The site boundary, however, is on the developed Zuma Beach Lifeguard headquarters, which is predominantly paved and includes a small sand garden with native plants adjacent to the building. Site LEPS includes a paved road, water tank, and a border of coastal sage scrub habitat that is mowed regularly. It is also bounded on three sides by paved roads.

Construction Impacts

Construction activities could result in the loss of native vegetation, the introduction of invasive species, or an impact to the federally protected western snowy plover (at Site ZHQ). Therefore, development of sites LEPS and ZHQ would have a significant impact on biological resources protected in the Malibu LCP, by Con Policies 1.1.1, 1.1.3, 1.2.4, and 1.2.5. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Operation Impacts

With the placement of an additional communications tower at a Project site, the new structure increases the probability of a bird strike hazard, even if other towers are present. Permanent removal of vegetation decreases, although minimally, the size of habitat available for protected biological resources. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur approximately once a month; this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, however, without impacts at a landscape level. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities and so would not change the character or magnitude of existing impacts. Due to the potential for protected species in nearby areas, operations of the proposed Project could have a significant impact on biological resources protected by the Malibu LCP.

Mitigation Measures

The Project will implement mitigation measures that provide for preservation of biological resources including sensitive wildlife species, which are goals of the Malibu General Plan. The mitigation measures that will be implemented to reduce impacts on biological resources to less than significant at sites LEPS and ZHQ are provided in Table 3.3-12.

Impacts after Mitigation

With the implementation of the mitigation measures, the proposed Project will have a less than significant impact on biological resources protected by the City of Malibu's LCP and General Plan.

County of Los Angeles General Plan - Sites OAT, PHN, RIH, and TPK

Policy C/NR 3.1 is considered for sites OAT, PHN, RIH, and TPK. Policies C/NR 3.8 and C/NR 3.9 are considered for Site TPK, which is the only site in this group that lies within an SEA (the San Andreas SEA). The San Andreas SEA includes several important linkages for wildlife movement. The San Andreas Fault Zone connects with the Santa Clara River drainage in the Lake Hughes area, linking with this large watershed that extends to the Pacific Ocean in Ventura County. The foothills and grassland in the westernmost segment of the SEA are part of an important linkage between the San Gabriel Mountains and the Tehachapi Mountains. This linkage to the Tehachapi Mountains is important because it connects the southernmost extent of the Sierra Nevada Mountains with the San Gabriel Mountains and the southern Coast Ranges. The Tehachapi Mountains are the only mountain linkage between the Transverse Ranges and the southern Coast Ranges to the Sierra Nevada Range. This largely natural area is an important topographic reference for migrating birds and bats, functioning as essential high elevation foraging grounds along their migration route.

Construction Impacts

Construction activities at sites OAT, PHN, RIH, and TPK could result in removal of vegetation and human disturbance at each site and, therefore, could result in conflict with the Los Angeles County General

Plan's Policy C/NR 3.1. Each of the sites includes an existing tower facility, related infrastructure, and access road along with disturbed native scrub vegetation. The current use at each of the sites is as a communications facility. Ground disturbance associated with proposed construction at the site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected. A description of the potential for impact to these sites is provided in Section 3.3.4.1 BIO-1 Impact Analysis and BIO-2 Impact Analysis. Because these activities could impact species protected by the County of Los Angeles General Plan Policy C/NR 3.1, a potential for conflict would occur. Construction impacts on resources protected by the Plan at sites OAT, PHN, RIH, and TPK would be significant.

Site TPK is an already disturbed site adjacent to at least nine other communications towers and is approximately 1 mile northeast of I-5. It is also located at the far northwestern section of the almost 100,000-acre San Andreas SEA, so migration within the SEA will not be significantly impacted due to construction activities. Its location at the convergence of the Coastal Ranges into the San Gabriel Mountains, Antelope Valley, and Tehachapi Mountains provides for an important wildlife corridor; however, due to its already developed nature, construction activities will not significantly impact migration corridors or wildlife linkages between metapopulations of species. Additionally, the site is dominated by nonnative grassland habitat, which is not the pristine headwaters, riparian habitat, marshes and sinks, or diverse vegetation communities unique to this SEA. Because Site TPK is already a developed communications site, there is no conflict with Policy C/NR 3.8, and impacts associated with construction at the site would be less than significant.

Proposed construction of Site TPK does have the potential to impact biological resources within the SEA, as described in Section 3.3.4.1 BIO-1 Impact Analysis and BIO-2 Impact Analysis; and design could potentially fail to prioritize avoidance of the most sensitive biological resources on site. Because these activities could impact resources in the SEA, a potential for conflict with Policy C/NR 3.9 would occur. Construction impacts on resources protected by Policy C/NR 3.9 at Site TPK would be significant.

Operation Impacts

With the placement of an additional communications tower at each of these proposed Project sites, the new structure increases the probability of a bird strike hazard, even if other towers are present. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur approximately once a month; this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, although without impacts at a landscape level. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities and so would not change the character or magnitude of existing impacts. Operations at each of the Project sites would not conflict directly with any of the identified Los Angeles County General Plan policies, and the proposed activities would have a less than significant impact on the resources protected by the plan policies identified.

Mitigation Measures

Mitigation measures intended to reduce construction impacts associated with conflicts with County of Los Angeles General Plan policies C/NR 3.1 and 3.9 at sites OAT, PHN, RIH, and TPK are provided in Table 3.3-12.

Impacts after Mitigation

Implementation of these mitigation measures would reduce the potential for impacts associated with construction activities at sites OAT, PHN, RIT, and TPK, thus reducing the potential for conflict with policies C/NR 3.1 and C/NR 3.9 of the Los Angeles County General Plan. With implementation of these measures, construction impacts associated with conflicts to the plan's policies at sites OAT, PHN, RIT, and TPK would be reduced to less than significant.

City of Chino Hills General Plan – Site AJT

Construction Impacts

Site AJT would be constructed at an existing communications facility containing a tower within highly disturbed open space. The site is mostly devoid of vegetation, but the study area contains nonnative grasses and scattered shrubs and walnut trees. The site is surrounded by open space, and the proposed construction would not inhibit wildlife movement in the area. The study area could serve as low-quality foraging habitat for golden eagle or long-eared owl. No trees occur within the site proper. Minimal conflict could occur with Action 1.2.2, associated with construction impacts on the two raptor species identified. Impacts from proposed Project construction on Action 1.2.2 would be less than significant, and no impact associated with the City's tree policies would occur.

Operations Impacts

The proposed new antenna support structure at Site AJT increases the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count, which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on site, the lack of protected species known to occur near the sites, and the minimal activity associated with maintenance and repair activities, operations of the proposed Project would have a less than significant impact on biological resources protected by the City of Chino Hills General Plan. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis.

Mitigation Measures

Although no significant impacts were identified, mitigation measures were identified that would further reduce the potential for impacts associated with construction activities at Site AJT, thus further reducing the potential for conflict with Action 1.2.2 of the City of Chino Hills General Plan. With implementation of the mitigation measures provided in Table 3.3-12 for site AJT, impacts associated with conflicts with

local policies or ordinances associated with proposed construction and operations at Site AJT would remain less than significant.

Incorporated Cities in Los Angeles County

The following is a discussion of potential impacts within incorporated cities in Los Angeles County. At these municipalities, the Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such local plans, policies, and regulations are not applicable to the Project. Nevertheless, in the exercise of its discretion and in the interest of working cooperatively with local jurisdictions, this Draft EIR references, describes, and addresses local land use plans, policies, and regulations. The Draft EIR takes this approach in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies, and regulations assists in determining whether the proposed Project may conflict with nearby land uses, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts.

City of Agoura Hills General Plan - Site AGH

Construction Impacts

Site AGH would be constructed at an existing communications facility containing three towers within open space designated by the city. The site is mostly bladed and contains nonnative grasses and a few scattered walnut trees, which are not specified for protection under the policy. In addition, BMPs identified to prevent runoff from the site would prevent potential erosion from the site. No conflict with Policy NR-4.2 has been identified. Construction would not result in conflict with the city's oak tree ordinance, as no oak trees are present on site. Impacts from proposed Project construction on Policy NR-4.2 would be less than significant, and no impact would be associated with the city's oak tree ordinance.

Operation Impacts

The proposed new antenna support structure at Site AGH increases the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count, which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on site, the lack of protected species known to occur near the site, and the minimal activity associated with maintenance and repair activities, operations of the proposed Project would have a less than significant impact on biological resources protected by the Agoura Hills General Plan. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis and BIO-2 Impact Analysis.

Mitigation Measures

No mitigation measures are required.

City of Calabasas General Plan - Site ENT

Construction Impacts

Proposed construction activities have a potential to impact biological resources at Site ENT. Proposed construction would occur within an existing communications site; and the potential for measureable losses of species diversity or habitats is low, since any ground disturbance would occur within an area already disturbed and containing low quality habitat. The site contains no wetlands or riparian areas. No oak trees occur on site. There is a potential to impact sensitive biological resources during construction, due to increased traffic, noise, motion, and dust generation. These impacts are discussed under Section 3.3.4.1 BIO-1 Impact Analysis. Because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Calabasas General Plan exists.

Operations Impacts

The proposed new antenna support structure at Site ENT would increase the probability of a bird strike hazard. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count on the access road and public roads leading to the site, which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Calabasas General Plan exists.

Mitigation Measures

No mitigation measures are required.

City of Glendale General Plan - Sites FTP and VPK

Construction Impacts

While native vegetation occurs in the study area of sites FTP and VPK, only disturbed vegetation and development occurs within the actual site boundary of either of the two sites. Ground disturbance associated with construction at each site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected at either site. As a result, any conflicts with the City of Glendale General Plan associated with construction activities at sites FTP and VPK would be minor, and construction impacts at the sites would be less than significant. Because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Glendale General Plan exists.

Operation Impacts

The proposed new antenna support structure at sites FTP and VPK increase the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count, which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on these sites, the lack

of protected species known to occur near the sites, and the minimal activity associated with maintenance and repair activities, operations associated with the proposed Project at sites FTP and VPK would have a less than significant impact on biological resources protected by the City of Glendale General Plan. Because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Glendale General Plan exists. For specifics on the potential impacts to sensitive biological resources, refer to Section 3.3.4.1 BIO-1 Impact Analysis and BIO-2 Impact Analysis.

Mitigation Measures

No mitigation measures are required.

City of San Dimas General Plan - Site SDW

Construction Impacts

No Project-related policies within the City of San Dimas General Plan were identified, and no impact would occur to resources protected by the City of San Dimas General Plan from the proposed construction activities associated with Site SDW. Further, because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of San Dimas General Plan exists.

Operation Impacts

As no Project-related policies within the City of San Dimas General Plan were identified, no conflicts would occur, and there would be no impact from the proposed operations activities associated with resources protected by the City of San Dimas at Site SDW. Further, because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of San Dimas General Plan exists.

Mitigation Measures

No mitigation measures are required.

City of Whittier General Plan - Site H-17A

Construction Impacts

Construction activities could remove vegetation and, therefore, could result in conflict with the City of Whittier General Plan. Site H-17A includes an existing tower facility and road but also includes disturbed native scrub vegetation. The use of the site is as a communications facility, and most of the buildable (flat) portion of the site is developed. Ground disturbance associated with proposed construction at the site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected. As a result, any impacts to biological resources protected by the City of Whittier General Plan at Site H-17A would be minor. Because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Whittier General Plan exists.

Operation Impacts

With the placement of an additional communications tower at a Project site, the new structure increases the probability of a bird strike hazard, even if other towers are present. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur approximately once a month; this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, however, without impacts at a landscape level. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities and so would not change the character or magnitude of existing impacts. Due to the potential for protected species in nearby areas, operations of the proposed Project could have a significant impact on biological resources protected by the City of Whittier General Plan (as well as other applicable protections which are in force and discussed under Section 3.3.4.1 BIO-1 Impact Analysis). However, because the Authority is exercising intergovernmental immunity, the plan is not applicable, and no conflict with the City of Whittier General Plan exists.

Mitigation Measures

No mitigation measures are required.

BIO-6. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Plans and regulations that provide protection of native habitats fall under various designations including habitat conservation plans (HCPs) established under the federal Endangered Species Act (ESA) and Natural Community Conservation Plans (NCCPs) established by the State of California. Only one proposed Project site, Site MMC, is included within the boundaries of an HCP or NCCP.

West Mojave Plan – Habitat Conservation Plan

Construction Impacts

Because no WEMO protected species occur on Site MMC, no conflicts have been identified, and no impacts are anticipated.

Operations Impacts

Because no WEMO protected species occur on Site MMC, no conflicts have been identified, and no impacts are anticipated.

Mitigation Measures

No mitigation measures are required.

Summary of Project-related Impacts to Biological Resources and Mitigation Measures by Proposed Project Site

Special biological resources associated with each proposed Project site are summarized in Table 3.3-12, which also identifies the required mitigation measures at a proposed Project site and the resulting impact determination for each species potentially occurring at a proposed Project site.

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
AGH	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 19 Trenches and Holes Management BIO MM 18 Nesting Bird Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	migratory birds	LM	
	Sensitive Community – California walnut woodland	LM	
	Local Policies - City of Agoura Hills General Plan	LS	
AJT	golden eagle (<i>Aquila chrysaetos</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 23 Prevent the Spread of Nonnative Vegetation
	long-eared owl (<i>Asio otus</i>)	LM	
	migratory birds	LM	
	Sensitive Community – California walnut woodland	LM	
	Local Policies - City of Chino Hills General Plan	LS	
ASD	migratory birds	NI	None Required
BJM	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	California dissanthelium (<i>Dissanthelium californicum</i>)	LM	
	island rush-rose (<i>Crocانthemum greenei</i>)	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	round-leaved filaree (<i>California macrophylla</i>)	LM	<ul style="list-style-type: none"> • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	LM	
	Townsend’s big-eared bat (<i>Corynorhinus townsendii</i>)	NI	
	Wallace’s nightshade (<i>Solanum wallacei</i>)	LM	
	migratory birds	LM	
	Local Policies - Santa Catalina Island Local Coastal Plan	LM	
BUR	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection
	migratory birds	LM	
BUR1	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection
	migratory birds	LM	
BUR2	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection
	migratory birds	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
BUR3	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection
	migratory birds	LM	
CPK	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 19 Trenches and Holes Management • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Castro Peak/Santa Monica Mountains - Pine Mountain/Sespe Condor	LS	
	Local Policies - Santa Monica Mountains Local Coastal Program	LM	
DPK	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	island rush-rose (<i>Crocanthemum greenei</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Santa Cruz Island rockcress (<i>Sibara filifolia</i>)	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	migratory birds	LM	<ul style="list-style-type: none"> BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Local Policies - Santa Catalina Island Local Coastal Plan	LM	
ENC1	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	LM	
	migratory birds	LM	
	Local Policies - Santa Monica Mountains Local Coastal Program	LM	
ENT	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	Lyon’s pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	migratory birds	LM	
FRP	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan
	mountain yellow-legged frog	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	– Southern California DPS (<i>Rana muscosa</i>)		<ul style="list-style-type: none"> • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	San Antonio milk-vetch (<i>Astragalus lentiginosus</i> var. <i>antonius</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	
FTP	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation
	California condor (<i>Gymnogyps californianus</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	migratory birds	LM	
	Sensitive Community – Southern sycamore alder riparian woodland	LS	
GMT	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection
	California condor (<i>Gymnogyps californianus</i>)	LM	
	migratory birds	LM	
GRM	Braunton’s milk-vetch	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	(<i>Astragalus brauntonii</i>)		Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NE	
	white-veined monardella (<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>)	LM	
	migratory birds	LM	
	Sensitive Community – Southern sycamore alder riparian woodland	LS	
	Critical Habitat – Braunton’s milk-vetch	LM	
	Local Policies - Topanga State Park General Plan	LM	
H-17A	burrowing owl (<i>Athene cunicularia</i>)	LM	• BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation) • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LM	
	intermediate mariposa-lily (<i>Calochortus weedii</i> var. <i>intermedius</i>)	LM	
	migratory birds	LM	
	Critical Habitat – coastal California gnatcatcher	LM	
H-69B	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	• BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting
	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California mountain	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	kingsnake (<i>Lampropeltis zonata</i>)		<ul style="list-style-type: none"> BIO MM 4 Site Sanitation BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	migratory birds	LM	
	Local Policies - Santa Monica Mountains Local Coastal Program	LM	
JOP	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	arroyo toad (<i>Anaxyrus californicus</i>)	LM	
	California condor (<i>Gymnogyps californianus</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	Greata's aster (<i>Symphyotrichum greatae</i>)	LM	
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	migratory birds	LM	
	Sensitive Community - Southern coast live oak riparian forest and woodland	LS	
JPK	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
			<ul style="list-style-type: none"> BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 18 Nesting Bird Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
JPK2	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 18 Nesting Bird Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	
LACF072	Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	marcescent dudleya (<i>Dudleya cymosa</i> ssp. <i>marcescens</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	Santa Monica dudleya (<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>)	LM	
	Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	LM	
	migratory birds	LM	
	Sensitive Community - Southern coast live oak riparian forest and woodland	LS	
	Local Policies - Santa Monica Mountains Local Coastal	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Program		
LACFCP08	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	
	migratory birds	LM	
LACFCP09	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	LM	
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Contract Point - Santa Susanna Mountains	LS	
LACFCP11	arroyo toad (<i>Anaxyrus californicus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation
	California condor (<i>Gymnogyps californianus</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	LS	<ul style="list-style-type: none"> BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 15 Southwestern Willow Flycatcher Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation
	unarmored threespine stickleback (<i>Gasterosteus aculeatus williamsoni</i>)	NI	
	migratory birds	LM	
	Sensitive Community – Southern California threespine stickleback stream; Southern coast live oak riparian forest and woodland; Southern cottonwood willow riparian forest; Southern riparian scrub; Southern sycamore alder riparian woodland.	LS	
	Critical Habitat – arroyo toad	LM	
	Wildlife Linkage - San Gabriel Mountains West - San Francisquito	LS	
LARICSHQ	migratory birds	NI	None Required
LEPS	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection BIO MM 14 Coastal California Gnatcatcher Protocol Surveys BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	Santa Susana tarplant (<i>Deinandra minthornii</i>)	LM	
	Sonoran maiden fern (<i>Thelypteris puberula</i> var. <i>sonorensis</i>)	LM	
	migratory birds	LM	
	Sensitive Community – Southern mixed riparian forest	LS	
	Local Policies - City of Malibu Local Coastal Program	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
LPC	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	Davidson’s bush-mallow (<i>Malacothamnus davidsonii</i>)	LM	
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	migratory birds	LM	
	Sensitive Community - Southern coast live oak riparian forest and woodland	LS	
	Wildlife Linkage - Contract Point - Santa Susanna Mountains	LS	
MMC	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	migratory birds	LM	
MML	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	migratory birds	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Sensitive Community - Southern coast live oak riparian forest and woodland	LS	<ul style="list-style-type: none"> BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation
	Wildlife Linkage - San Gabriel Mountains West - San Francisquito	LS	
MTL2	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	California condor (<i>Gymnogyps californianus</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	Davidson’s bush-mallow (<i>Malacothamnus davidsonii</i>)	LM	
	migratory birds	LM	
OAT	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 11 Site Access BIO MM 17 Raptor Protection
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	western mastiff bat (<i>Eumpos perotis californicus</i>)	NI	
	migratory birds	LM	
	Sensitive Community – Southern mixed riparian forest	LS	
	Wildlife Linkage - Contract Point - Santa Susanna	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Mountains		<ul style="list-style-type: none"> BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 23 Prevent the Spread of Nonnative Vegetation
	Local Policies - County of Los Angeles General Plan	LM	
PASPD01	migratory birds	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 18 Nesting Bird Protection
PDC	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	None Required
	migratory birds	NI	
PHN	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 23 Prevent the Spread of Nonnative Vegetation
	migratory birds	LM	
	Sensitive Community – California walnut woodland	LS	
	Critical Habitat – coastal California gnatcatcher	NI	
	Local Policies - County of Los Angeles General Plan	LM	
PMT	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	Rock Creek broomrape (<i>Orobanche valida</i> ssp. <i>valida</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
			<ul style="list-style-type: none"> BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
PWT	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection BIO MM 14 Coastal California Gnatcatcher Protocol Surveys BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LM	
	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	
	migratory birds	LM	
RIH	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions
	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LM	
	intermediate mariposa-lily (<i>Calochortus weedii</i> var. <i>intermedius</i>)	LM	
	San Diego woodrat (<i>Neotoma lepida intermedia</i>)	LS	
	migratory birds	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Critical Habitat – coastal California gnatcatcher	LM	<ul style="list-style-type: none"> • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
	Local Policies - County of Los Angeles General Plan	LM	
SDW	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LS	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation
	migratory birds	LM	
	Sensitive Community – California walnut woodland	LM	
	Critical Habitat – coastal California gnatcatcher	NI	
SGH	migratory birds	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection
SIM	migratory birds	NI	None Required
SPN	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation
	Braunton’s milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California mountain kingsnake (<i>Lampropeltis zonata</i>)	LS	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	
	migratory birds	LM	
	Local Policies - Santa Monica Mountains Local Coastal	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Program		<ul style="list-style-type: none"> BIO MM 24 Special Status Plants Surveys and Protection
SUN	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	
SUN2	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	
TMT	Big Bear Valley woollypod (<i>Astragalus leucolobus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring
	California condor (<i>Gymnogyps californianus</i>)	LM	
	grey-leaved violet (<i>Viola pinetorum</i> var. <i>grisea</i>)	LM	
	mountain yellow-legged frog – Southern California DPS (<i>Rana muscosa</i>)	LM	
	San Antonio milk-vetch	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	(<i>Astragalus lentiginosus</i> var. <i>antonius</i>)		<ul style="list-style-type: none"> BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	migratory birds	LM	
	Wildlife Linkage - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga	LS	
TOP	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection BIO MM 22 Monarch Butterfly Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	Braunton's milk-vetch (<i>Astragalus brauntonii</i>)	LM	
	California mountain kingsnake (<i>Lampropeltis zonata</i>)	LS	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	
	migratory birds	LM	
	Local Policies - Santa Monica Mountains Local Coastal Program	LM	
TPK	California condor (<i>Gymnogyps californianus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection
	coast horned lizard (<i>Phrynosoma blainvillii</i>)	LS	
	golden eagle (<i>Aquila chrysaetos</i>)	LM	
	Tehachapi pocket mouse (<i>Perognathus alticolus inexpectatus</i>)	LS	
	migratory birds	LM	
	Sensitive Community – Wildflower field	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
	Local Policies - County of Los Angeles General Plan	LM	<ul style="list-style-type: none"> BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 23 Prevent the Spread of Nonnative Vegetation
TWR	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 20 Santa Catalina Island Fox Protection BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
	bald eagle (<i>Haliaeetus leucocephalus</i>)	LM	
	decumbent goldenbush (<i>Isocoma menziesii</i> var. <i>decumbens</i>)	LM	
	island rush-rose (<i>Crocanthemum greenei</i>)	LM	
	Lyon's pentachaeta (<i>Pentachaeta lyonii</i>)	LM	
	round-leaved filaree (<i>California macrophylla</i>)	LM	
	Santa Catalina Island bedstraw (<i>Galium catalinense</i> ssp. <i>catalinense</i>)	LM	
	Santa Catalina Island fox (<i>Urocyon littoralis catalinae</i>)	LM	
	Wiggins' cryptantha (<i>Cryptantha wigginsii</i>)	LM	
	migratory birds	LM	
Local Policies - Santa Catalina Island Local Coastal Plan	LM		
VPK	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 12 Coastal California Gnatcatcher Protection BIO MM 17 Raptor Protection BIO MM 18 Nesting Bird Protection
	California condor (<i>Gymnogyps californianus</i>)	LM	
	coastal California gnatcatcher (<i>Polioptila californica californica</i>)	LS	
	Davidson's bush-mallow (<i>Malacothamnus davidsonii</i>)	LM	
	migratory birds	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
			<ul style="list-style-type: none"> BIO MM 23 Prevent the Spread of Nonnative Vegetation BIO MM 24 Special Status Plants Surveys and Protection
WAD	Monarch butterfly (<i>Danaus plexippus</i>)- roosting	LS	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 6 Anti-perch Devices (selected sites) BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 18 Nesting Bird Protection BIO MM 22 Monarch Butterfly Protection
	migratory birds	LM	
WMP	arroyo toad (<i>Anaxyrus californicus</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife BIO MM 10 No Pets BIO MM 11 Site Access BIO MM 18 Nesting Bird Protection BIO MM 19 Trenches and Holes Management BIO MM 21 Protected Amphibian Protection
	California condor (<i>Gymnogyps californianus</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	migratory birds	LM	
	Critical Habitat – California red-legged frog	LM	
WS1	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	None Required
	migratory birds	NI	
WTR	American peregrine falcon (<i>Falco peregrinus anatum</i>)	LM	<ul style="list-style-type: none"> BIO MM 1 Mitigation Monitoring and Reporting Plan BIO MM 2 WEAP BIO MM 3 Biological Compliance Reporting BIO MM 4 Site Sanitation BIO MM 5 Hazardous Materials Management BIO MM 6 Anti-perch Devices BIO MM 7 California Condor Protection BIO MM 8 Biological Monitoring BIO MM 9 Protect Native Vegetation and Common Wildlife
	California condor (<i>Gymnogyps californianus</i>)	LM	
	California red-legged frog (<i>Rana draytonii</i>)	LM	
	slender mariposa-lily (<i>Calochortus clavatus</i> var. <i>gracilis</i>)	LM	
	migratory birds	LM	

Table 3.3-12: Special Status Species of Wildlife and Plants, and Sensitive Natural Communities with the Required Mitigation Measures at Each of the Proposed Project Sites

Site	Species	Determination*	Mitigation Measures
			<ul style="list-style-type: none"> • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection
ZHQ	Monarch butterfly (<i>Danaus plexippus</i>)- migratory	NI	<ul style="list-style-type: none"> • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 10 No Pets • BIO MM 16 Snowy Plover Protection • BIO MM 18 Nesting Bird Protection
	western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	LM	
	migratory birds	LM	
	Critical Habitat – western snowy plover	LM	
	Local Policies - City of Malibu Local Coastal Program	LM	
* NI = No Impact LS = Less than Significant Impact LM = Significant Impact Reduced to Less than Significant with Mitigation Incorporated S = Significant and Unavoidable Impact			

3.3.5 Cumulative Impact Analysis of the Proposed Project

Consideration of cumulative effects to biological resources from the proposed Project is based on the incremental impacts of the proposed Project, combined with the effects of past, present, and probable future projects that may have impacts similar to the proposed Project (see Table 2.7-1). Potential Project-related impacts are identified in Section 3.3.4.1 on a species-by-species basis. The analysis also includes a discussion of loss of native vegetation that provides habitat for special status species; mortality of small species of wildlife (e.g., snakes, frogs and toads, small mammals) on roads used by project vehicles; loss of special status plants as a result of vegetation clearing; disturbance to wildlife due to construction related noise; use of inappropriate perch sites by raptors and condors; consumption of hazardous materials by wildlife (e.g., microtrash consumed by condors); exposure of birds to radio frequency (RF) microwave transmissions at communications towers; and collision with tower structures by migratory birds.

3.3.5.1 Geographic Extent

The geographic extent for consideration of cumulative impacts associated with the proposed Project varies by species, up to all of Los Angeles County and the portion of San Bernardino County that surrounds Site AJT, located in the city of Chino Hills. Included in Table 2.7-1 are over 700 past present or future projects that may contribute to cumulatively significant impacts to biological resources. The projects listed in Table 2.7-1 are within 2 miles of one of the 54 proposed Project sites. These include LMR sites that have previously been determined exempt from CEQA under PRC §21080.25. Of the 54 sites analyzed in this EIR, proposed facilities include 35 new towers, 12 new monopoles, 4 building mounts, and 3 collocations on existing structures. The geographic scope of analysis for cumulative impacts related to biological resources focuses within 2 miles of each proposed Project site but also considers the entire region defined by Los Angeles County and portions of all neighboring counties to address wide-ranging species (e.g., California condor, golden eagle, migratory birds).

The geography associated with cumulative impact analysis for Impact BIO 5 and Impact BIO 6 is limited to the geography associated with the plans potentially affected by construction and operation of each of the proposed Project sites identified within planning boundaries.

3.3.5.2 Existing Cumulative Conditions

The proposed Project vicinity includes a large expanse of the Los Angeles County region. The area has seen extensive development, both private and federal, over the past century, resulting in loss and fragmentation of wildlife habitat and native plant communities and ultimately leading, in part, to various species of plants and animals being listed under the ESA, or other species receiving status designations by resource management agencies indicating concerns with declining populations. Though there are many environmental compliance requirements placed on current developments, future growth and development will likely accelerate continued habitat loss and other impacts to biological resources.

Reasonably foreseeable projects that could contribute to the cumulative effects to biological resources are listed in Table 2.7-1. The potential construction and operation of over 750 identified known and anticipated cumulative projects in the vicinity of proposed LMR Project sites would generally be expected to result in similar types of impacts to biological resources as the development of proposed LMR Project sites. Many of the projects identified in Table 2.7-1 are small scale and within urban settings, with few anticipated impacts to the natural environment. Other projects such as electrical transmission lines and communication towers would result in temporary and permanent losses of native habitat and disturbance to wildlife. These projects in combination with the proposed Project have the potential to contribute to a cumulative impact on the environment. However, the existing conditions at each of these cumulative project sites are unknown, including the existing levels of disturbance; the quality of habitat for special status species; geographic extent of developments; the availability of existing access roads; the design of towers (e.g., whether guy wires or lights would be required) and facilities; or the requirements for on-site habitat restoration and species protection measures. Most of the projects listed in Table 2.7-1 that may have a significant impact on the environment have, are, or will be required to undergo their own independent review for environmental compliance.

Special biological resources associated with each proposed Project site is summarized in Table 3.3-12, which also identifies the required mitigation measures at a proposed Project site and the resulting impact determination for each species potentially occurring at a proposed Project site.

3.3.5.3 Cumulative Impact Analysis

BIO-1. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potential project-related impacts to 23 special status wildlife species and 23 special status plant species were evaluated at one or more of the 54 proposed Project sites evaluated in this EIR. Species of plants and wildlife that are designated as special status species are already considered to be compromised as a result of past and continued human activity and development throughout the region. Therefore, continued habitat loss, mortality of wildlife, or disturbance to wildlife as a result of any project included on the cumulative projects list (see Table 2.7-1) would constitute a significant cumulative impact on the environment as a result of the proposed Project in combination with other past, present, and future projects causing related impacts. The development of proposed Project sites would minimally contribute to cumulative effects to special status wildlife or plant species because proposed Project facilities are located in association with a previously developed site, habitat loss is minimized through the application of mitigation measures, species-specific protection measures would be implemented, and potential disturbance is of short duration and minimized by the rapid attenuation of noise from construction activities. The proposed Project would alter neither the decline nor recovery of these species. In each case where proposed Project actions could result in impacts to a special status species, mitigation measures were incorporated into the proposed Project to ensure that impacts would be reduced to a level of less than significant (see Section 3.3.4.1, BIO1-1 Impact Analysis). The list of analyzed species and the required mitigation measures at specific proposed Project sites is summarized in Table 3.3-12. Implementation of mitigation measures would minimize the incremental environmental effect of the development of proposed Project sites such that its contribution to a significant cumulative impact to special status species would not be cumulatively considerable.

Many of the identified cumulative projects would include some type of elevated structures, similar to the developments at proposed Project sites. At 34 proposed Project sites new lattice towers up to 180 feet tall would be constructed (sites BJM, BUR, BUR1, BUR2, BUR3, CPK, ENC1, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, MMC, MML, MTL2, OAT, PHN, PMT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WMP, and WTR); at one site (DPK) a 200-foot-tall tower is proposed. All elevated structures (e.g., communication towers, high-rise buildings, bridges, transmission lines and towers) have the potential to kill or injure migratory birds due to collision, especially during nighttime migration with low-cloud-ceiling conditions (Manville 2000). The American Bird Conservancy reports an estimated 6.8 million birds of up to 350 species are killed annually by collision with communication towers in the

United States and Canada (Longcore et al. 2012). A large proportion of this mortality is attributed to extremely tall, lighted towers with guy lines, often located in bird concentration areas or migration pathways (Manville 2014). In addition, microwave communication towers can expose birds that may nest on the structure to RF radiation. As of 2000, an estimated 75,000 communications towers were licensed in the United States by the FCC, of which some 46,000 were lighted and exceeded 200 feet in height (Manville 2000). By 2011 an estimated 110,228 towers were in the United States, with 13,329 constructed in California alone (<http://wirelessestimator.com/community/threads/of-cell-tower-sites-per-state-in-the-usa.1299/>)

In addition to communications towers, transmission towers and lines can also result in bird mortality through electrocution, and collision with towers and lines (USFWS 2000). California has 43,143 miles of electrical transmission lines (not including distribution lines) with generally four to five towers per mile (http://www.energy.ca.gov/maps/infrastructure/transmission_lines.html). This data is not specific to Los Angeles County but provides context for the analysis. Rioux et al. (2013) estimate losses from transmissions lines at between 2.5 to 25.6 million birds a year (USFWS 2000). Modern transmission towers are designed to discourage nesting by large birds and have various protections to minimize the risk of bird electrocutions. The Audubon Society reports that 365 million to 988 million birds in the United States are killed annually by collisions with windows. Overall, unguyed communications towers are a relatively minor component of total bird losses attributed to towers (Longcore et al. 2012; Rioux et al. 2013). Nonetheless, mass mortalities (more than several hundred birds per night) have been documented at unguyed, unlit monopole and lattice towers (DOI 2014). The placement and operation of communication towers, including unguyed, unlit, monopole or lattice-designed structures, impact protected migratory birds in significant ways (DOI 2014).

The proposed Project would include construction of approximately 90 communication towers throughout Los Angeles County. All of these are collocated at existing developed facilities, and all but one tower would not exceed 199 feet in height (site DPK at 200 feet). Though these towers are below the general height recommendations for lighted towers (i.e., 199-feet-tall), the FAA may require lights on some or all proposed Project towers. At least one of these towers on the cumulative project list may be over 200 feet in height, and likely several would require lighting. In addition, during migration birds interact with their environment at a landscape-level, and local impacts may have long-distance consequences. The construction of up to 90 LMR Project antennas would be in addition to the existing 1,193 cell towers in Los Angeles County registered by the FCC (City-Data.com 2015), representing a 7.5-percent increase in licensed communication towers in Los Angeles County over current conditions. It is unknown how many additional towers may be constructed within Los Angeles County or across the vast distances traveled by migratory birds.

To address concerns over bird mortality at communications towers, the USFWS Office of Migratory Birds has issued voluntary guidelines for communication towers (USFWS 2013a) for tower placement, construction, and operation. These guidelines emphasize collocation wherever possible to reduce the total number of towers and recommend that structures are either a lattice tower or monopole design,

that towers be no more than 199 feet above ground level, that guy wires are not required, that towers are unlighted if FAA regulations permit, and that security lighting is down-shielded and the minimum intensity needed. Other considerations include that towers are to be sited to avoid migratory pathways and other bird concentration areas, to minimize the loss of habitat, and to consider the presence of state and federally listed species. Little data is available concerning the level of bird mortality at towers that comply with USFWS guidelines.

The proposed Project fully complies with the voluntary guidelines for communications towers established by the USFWS Office of Migratory Birds at all sites with the exception of proposed Project site DPK on Santa Catalina Island, where a new 200-foot tall lattice tower would be constructed (USFWS guidelines recommend that tower height not exceed 199 feet). Monopole structures and their associated antennas are shorter in height and ultimately more visible to birds than their lattice tower counterparts and, thus, are more avoidable. While standing monopoles still pose some level of threat to birds in flight, the threat is greater from lattice tower structures. Forty seven new lattice towers are proposed for the LMR program (35 of which are directly addressed in this EIR and the remaining considered under the evaluation of cumulative impacts). In addition to the voluntary guidelines, anti-perch devices to discourage perching and nesting on tower structures would be installed as required mitigation measures on both lattice towers and monopoles at specific sites identified on a site-by-site basis (see Table 3.3-12). Despite these efforts, the current situation concerning the cumulative mortality of migratory birds at communication sites and other elevated structures is considered significant. It is expected that at least a low level of mortality would be associated with the presence of new lattice towers at 35 proposed Project sites plus new lattice towers at an additional 12 LMR project sites, and that operations of each Project facility would make a minimal contribution to the overall cumulative effects to mortality of migratory birds. The addition of about 90 LMR structures, 47 of which would be new lattice towers, along with other towers and elevated structures identified on the cumulative projects list (see Table 2.7-1) as well as the vast array of existing towers and high rise buildings across Los Angeles County contributes to the cumulative loss of migratory birds. This loss would be less substantive for tower structures that implement the USFWS voluntary guidelines for communications towers. This incremental impact of bird mortality due to proposed Project implementation is “cumulatively considerable” (Gordon and Herson 2011). Though the applicable standards for the construction of communication towers are being fully met (with the exception of Site DPK), no additional mitigation measures are available to reduce the proposed Project’s contribution to cumulative impacts to migratory birds to less than cumulatively considerable.

BIO-2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potential project-related impacts to sensitive communities and habitats were evaluated at 19 proposed Project sites (see Table 3.3-12). These sensitive communities and ESA critical habitat have been so designated because they are considered to be rare or degraded as a result of past and continued human

activity and development throughout the region. Therefore, continued habitat loss of sensitive communities and habitats as a result of any project included on the cumulative projects list (see Table 2.7-1) would constitute a significant impact on the environment. The development of proposed Project sites would minimally contribute to cumulative effects to sensitive communities or habitats because proposed Project facilities are located in association with a previously developed site, and habitat loss is minimized through the application of mitigation measures. In each case where proposed Project actions could result in impacts to a sensitive community or habitat, mitigation measures are incorporated into the proposed Project to ensure that impacts would be reduced to a level of less than significant (see Section 3.3.4.1, BIO-2 Impact Analysis). The analyzed sensitive communities and habitats and the required mitigation measures at specific proposed Project sites are summarized in Table 3.3-12. Implementation of mitigation measures would minimize the incremental environmental effect of the development of each proposed Project site such that its contribution to a significant cumulative impact to a sensitive community or habitat would not be cumulatively considerable. .

BIO-3. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No sites were identified that would result in construction- or operation-related impacts to wetlands. The proposed project would not contribute to cumulative impacts to these resources associated with construction or operational activities.

BIO-4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potential Project-related impacts to wildlife linkages were evaluated at 13 proposed Project sites (see Table 3.3-12). These wildlife connectivity corridors have been so designated because movement of wildlife across the landscape has been hindered by past and continued human activity and development throughout the region, and these corridors are identified in order to preserve and improve remaining habitat connectivity. Therefore, continued disruption of wildlife linkage corridors as a result of any project included in Table 2.7-1 would constitute a significant impact on the environment. The development of proposed Project sites would minimally contribute to cumulative effects to wildlife linkages because proposed Project facilities are located in association with a previously developed site, and habitat loss is minimized through the application of mitigation measures. Further, all potential Project-related impacts to wildlife linkages were determined to be less than significant. In each case where proposed Project actions may result in even this minor level of impact, mitigation measures were incorporated into the proposed Project to ensure that impacts would be further reduced (see Section 3.3.4.1, BIO-4 Impact Analysis). The analyzed wildlife linkages and the required mitigation measures at specific proposed Project sites are summarized in Table 3.3-12. Implementation of mitigation measures would minimize the incremental environmental effect of the development of proposed Project sites

such that its contribution to a significant cumulative impact to wildlife linkages would not be cumulatively considerable.

BIO-5. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Of the 54 sites evaluated to determine potential for conflict with local policies and ordinances that could affect biological resources, 9 sites were determined not to have potential conflicts; and these sites are not discussed further. Forty five sites were evaluated where conflicts resulting in less than significant impacts could occur. A discussion of the plans affecting each of these sites is discussed below.

Angeles National Forest Land Management Plan. Sites GMT, JOP, JPK, JPK2, MML, SUN/SUN2, and TMT each have a single project identified on Table 2.7-1 as being proposed or constructed within 2 miles. These include communication tower projects near sites GMT, MML, SUN, SUN2, and TMT, electrical transmission lines (the Tehachapi Renewables Transmission Project, near site JOP), and a housing development near sites JPK and JPK 2.

Significant cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the Angeles National Forest LMP were identified, but the proposed Project's contribution was determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant cumulative impact.

Santa Monica Mountains National Recreation Area General Management Plan. The SMMNRA GMP includes sites LACFCP08 and PWT. Sixty two projects were identified near Site LACFCP08. Most of these involved new, remodel, repair or add-on to single-family residences.

A total of 153 projects were identified within 2 miles of Site PWT. Nearly all were residential development or improvement projects.

Significant cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the SMMNRA GMP were identified, both the proposed Project's contribution was determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant cumulative impact.

Topanga State Park General Plan. No additional projects were identified within the plan boundary or in the vicinity of Site GRM. Cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the Topanga State Park General Plan were determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant impact.

Santa Catalina Island Local Coastal Program. Fourteen projects were identified on Table 2.7-1 as occurring on Santa Catalina Island. All 14 projects were within the limits of the City of Avalon, which is

not under the purview of the Santa Catalina Island Local Coastal Program. Cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the Santa Catalina Island Local Coastal Program were determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant impact.

Santa Monica Mountains Local Coastal Program. No additional projects were identified within 2 miles of sites CPK, H-69B, SPN, and TOP. Site ENC1 and LACF072 each had two projects identified. Both identified the proposed Malibu Institute, a mixed-use development that includes a retreat facility and golf course. Each also identified single-family residences being built at distances of 1.18 miles and 0.75 mile, respectively. Cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the Santa Monica Mountains LCP LUP and LIP were determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant impact.

Los Angeles County General Plan. Sites containing biological resources that are governed by the Los Angeles County General Plan include OAT, PHN, RIH, and TPK. The Los Angeles County General Plan covers specific unincorporated areas within Los Angeles County and is generally not applicable within incorporated cities.

One project was identified within 2 miles of Site OAT; the LA-RICS LTE monopole that was constructed at LTE Site ONK in 2015, located approximately 1.25 miles distant from Site OAT, and within the boundary of the Los Angeles County General Plan. Site PHN had one project identified, the LA-RICS LTE collocation that occurred at LTE Site PHN in 2015, located immediately adjacent. In both instances, the LTE development did not involve removal of native vegetation or take of sensitive species. No impacts to the underlying resources associated with Policy C/NR 3.1 would occur; therefore, no contribution to cumulative would occur from development of sites OAT and PHN. Sites RIH and TPK had no other projects identified within the boundary of the Los Angeles County General Plan within 2 miles of the proposed Project site.

The proposed project's contribution to significant cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the Los Angeles County General Plan were determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to have a cumulatively considerable contribution to a significant cumulative impact.

City of Malibu Local Coastal Program. The City of Malibu Local Coastal Program includes sites LEPS and ZHQ. A total of 47 projects were identified near Site LEPS. Most of these involved new, remodel, repair or add-on to single-family residences (the two closest within 0.25 mile of LEPS); along with some municipal work (water tank and water line improvements located at 0.13 mile from Site LEPS).

A total of 122 projects were identified within 2 miles of Site ZHQ. Nearly all were residential development or improvement projects, but nearby improvements at Zuma Beach such as new or remodeled restrooms were also included.

Significant cumulative impacts to the species and habitat resources (discussed in Impact BIO-1 and Impact BIO-2) protected under the City of Malibu Local Coastal Program were determined less than considerable, with the exception of potential impacts to migratory birds where the proposed Project was considered to add a cumulatively considerable contribution to a significant cumulative impact.

City of Chino Hills General Plan. Three projects that lie within the boundaries of the City of Chino Hills General Plan were identified within 2 miles of Site AJT. Based on a desktop review of existing site conditions, two of these appear to be residential or small commercial development activities that are in developed areas. The third, identified as Hidden Oaks Country Club, is a proposed 537-acre new golf course development that includes approximately 427 acres of open space. An EIR has not yet been prepared for this project, but it is assumed the loss of habitat associated within the development would constitute a significant impact to biological resources. Construction and operations as part of the proposed Project for Site AJT would not result in habitat loss. Therefore, the proposed Project activities at Site AJT would not constitute a cumulatively considerable contribution to significant impacts to biological resources in the area.

Incorporated Cities in Los Angeles County. General plans were reviewed for the cities of Agoura Hills, Calabasas, Glendale, San Dimas, and Whittier. At these municipalities, the Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such local plans, policies, and regulations are not applicable to the Project. Nevertheless, in the exercise of its discretion and in the interest of working cooperatively with local jurisdictions, this Draft EIR references, describes, and addresses local land use plans, policies, and regulations. Consideration of these plans, policies, and regulations assists in determining whether the proposed Project may conflict with nearby biological resources, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts. In all instances, impacts to underlying biological resources were determined to be less than significant once mitigation protecting those resources was employed. Because the Authority is exercising intergovernmental immunity, no impacts were identified to be associated with conflicts with these plans. Because no impact would occur, no cumulative impacts would result to the individual general plans that cover sites AGH, ENT, FTP, SDW, H-17A, and VPK.

BIO-6. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No sites were identified that would result in conflicts with provision of HCPs or NCCPs. No contribution to cumulative impacts to these resources associated with construction or operational activities are anticipated due to implementation of the proposed Project.

3.4 Cultural Resources

3.4.1 Environmental Setting – Cultural Resources

This section provides a brief prehistory and history of the area within which proposed Project activities would occur. The section also presents the existing setting in the vicinity of the Project and the regulatory environment that guides the identification and assessment of cultural resources, includes a discussion of the methods used during analysis, and summarizes impacts resulting from Project activities. The types of resources identified within a 0.5-mile radius of each proposed Project site are shown in Table 3.4-1 and further discussed in Chapter 4 (a summary of environmental data by Project site) and Appendix B-4 (Tables 1 through 4, which provide additional cultural resources data).

CEQA Guidelines Section 15120(d) prohibits an EIR from including information about the location of archaeological sites or sacred lands: “No document prepared pursuant to this article that is available for public examination shall include ... information about the location of archaeological sites and sacred lands.” Therefore, the specific locations of archaeological sites are not included in this chapter.

Table 3.4-1: Cultural Resources Identified within a 0.5-Mile Radius of Each Proposed Project Site

Site ID	Site Name	Prehistoric or Historic Archaeology or Native American Resources	Historic Buildings or Structures or District
AGH	Agoura Hills	X	N/A
AJT	AeroJet	N/A	N/A
ASD	Auto Square Drive	N/A	X
BJM	Black Jack Peak	N/A	X
BUR	Burnt Peak	X	X
BUR1	Burnt Peak – 1	X	X
BUR2	Burnt Peak – 2	X	X
BUR3	Burnt Peak – 3	X	X
CPK	Castro Peak	N/A	N/A
DPK	Dakin Peak	X	X
ENC1	Encinal 1 (Fire Camp 13)	X	N/A
ENT	Entrada Tank Site	X	N/A
FRP	Frost Peak (Upper Blue Ridge)	X	X
FTP	Flint Peak	N/A	N/A
GMT	Grass Mountain	X	X
GRM	Green Mountain	N/A	N/A
H-17A	H-17A	N/A	N/A
H-69B	H-69B	X	N/A
JOP	Josephine Peak	X	X
JPK	Johnstone Peak - 1	X	X
JPK2	Johnstone Peak - 2	X	X
LACF072	County FS 72	N/A	N/A
LACFCP08	Camp 8	N/A	X
LACFCP09	County CP 9	X	X
LACFCP11	County CP 11	X	N/A

Table 3.4-1: Cultural Resources Identified within a 0.5-Mile Radius of Each Proposed Project Site

Site ID	Site Name	Prehistoric or Historic Archaeology or Native American Resources	Historic Buildings or Structures or District
LARICSHQ	LA-RICS Headquarters Building	N/A	X
LEPS	Lower Encinal Pump Station	X	N/A
LPC	Loop Canyon	X	X
MMC	Mount McDill	X	N/A
MML	Magic Mountain Link	X	X
MTL2	Mount Lukens-2	X	X
OAT	Oat Mountain-1	N/A	X
PASPD01	Pasadena Police Department	N/A	X
PDC	Pacific Design Center	N/A	X
PHN	Puente Hills	N/A	X
PMT	Pine Mountain	X	X
PWT	Portshhead Tank	X	N/A
RIH	Rio Hondo	N/A	X
SDW	San Dimas	N/A	N/A
SGH	Signal Hill	X	X
SIM	Simpsons' Building	X	X
SPN	Saddle Peak	X	N/A
SUN	Sunset Ridge	X	X
SUN2	Sunset Ridge-2	X	X
TMT	Table Mountain	X	X
TOP	Topanga Peak	X	X
TPK	Tejon Peak	N/A	N/A
TWR	Tower Peak	N/A	N/A
VPK	Verdugo Peak-2	N/A	N/A
WAD	Walker Drive	N/A	X
WMP	Whittaker Middle Peak	X	X
WS1	100 Wilshire	N/A	X
WTR	Whittaker Ridge	X	X
ZHQ	Zuma Life Guard HQ	X	N/A

* N/A indicates that the type of resources indicated in the column heading do not occur within a 0.5-mile radius of the Project site.

3.4.1.1 Prehistory (Pre-1769)

Early Man Period

Perhaps more than any comparable area of North America, prehistoric California was biotically rich, heavily populated, and culturally diverse (Aikens 1978:133). Evidence is scant, but archaeologists generally believe that the earliest human occupation of southern California spans the time frame from approximately 12,500 to 6,000 years Before the Present (BP) (Wallace 1978: 214-230; Moratto 1984: 110-113; Altshul et al. 1984: 33; Glentis 2013: 8). Although the chronological sequences differ by researcher, the cultural chronology proposed by William J. Wallace (1955: 214-230) in "A Suggested Chronology for Southern California Coastal Archaeology" is still widely accepted today.

Using Wallace's chronology, the earliest of the cultural periods is known as the Early Man Period, or Horizon I. The Indians of this period (Paleo-Indians) were highly mobile hunters; lived in small, widely separated groups; and hunted with large stone projectile points fashioned from locally available materials. Technologies associated with ocean resource gathering were also utilized by coastal groups; however, because the sea level during this period was lower than today, most of the shoreline sites that could provide archaeological information regarding Paleo-Indian lifeways are under water (Chartkoff and Chartkoff 1984: 37-69). Nonetheless, upland sites around springs and caves on California's Channel Islands have produced some of the earliest evidence of seafaring and maritime adaptations in the Americas and reveal the diversity of Paleo-Indian lifeways (Smithsonian Science 2011). These include a fluted point from the western Santa Barbara Channel coast and deep, shell-filled deposits from a site north of Point Conception. Both of those finds date to before 10,000 years ago (Arnold and Walsh 2010).

Wherever Paleo-Indians lived, throughout the Western Hemisphere, they followed similar ways of life, hunted similar kinds of animals, and used similar kinds of tools. Pioneering economies kept the Paleo-Indian way of life simple but effective century after century (Chartkoff and Chartkoff 1984: 46).

Compared to other locations in the American West, few Paleo-Indian sites have been recorded in California, and most of those have been recorded along the shorelines of what were once large lakes of the interior desert valleys of southern California. These locations were desirable for their proximity to reliable water supplies as well as for the animals that they attracted (Smith 1999). The sites that have been identified comprise five basic types (Chartkoff and Chartkoff 1984: 50-57; NRHP Branch 2007):

- Occupation sites – locations where people lived for short periods of time. This site type is characterized by the remains of various activities, including tool making, food preparation, and sometimes cooking areas (hearths).
- Workshops – sites where the primary activity was tool manufacture. Workshops can be found as discreet areas of occupation sites but are also seen as separate sites near the source of raw materials.
- Butchering stations – specialized sites where large animals were killed and dismembered. Because of the size of some of the animals, the carcasses were not often relocated to the occupation site; rather, members of the group temporarily moved to the kill area.
- Burial sites – specialized sites where the primary feature is the interment of human remains.
- Isolated artifact sites – Isolates are individual artifacts. They are typically not associated with known sites; however, they can mimic a site if widely distributed over a large area. Within the Paleo-Indian context, isolated finds are critical for research purposes and are viewed as a specific property type for recording purposes (NRHP Branch 2007).

While thousands of isolated artifacts have been found across California, those most convincingly attributed to Paleo-Indians are fewer. Artifacts not associated with other datable materials (e.g., charcoal or the bones of extinct animals) are difficult to date, and items uniquely identifiable with the Paleo-Indian culture are limited in number. The only unambiguous exception is the fluted stone point,

which is universally associated with the end of the Paleo-Indian Period and, in some Western sites, has been found in association with extinct mammals of the Pleistocene Epoch (the most recent of the geologic ice ages).

More than 40 Paleo-Indian fluted points have been found across areas of southern California (Rondeau and Taylor 2003: 45); one rare find has been found at Crystal Cove State Park in coastal Orange County (Fitzgerald and Rondeau 2012). Inasmuch as the fluted points found in California have been recorded in every environmental setting (Fitzgerald and Rondeau 2012), there is little reason to assume that this site type might not be found at other locations in southern California.

As the Pleistocene Epoch came to a close, the climate warmed and the large herds of grazing animals that had been the center of the Paleo-Indian economy dwindled; some species became extinct. For the Paleo-Indians, these changes meant that previous ways of life could not continue; and subsistence patterns necessarily shifted from big game hunting to reliance on smaller animals and plant collection. For this reason, the end of the Pleistocene Epoch is typically used to mark the close of the Paleo-Indian Period (Chartkoff and Chartkoff 1984: 47; Altshul et al. 1984: 33-34).

Millingstone Period

The period between 6,000 BP and about 3,000 BP in southern California is most commonly known as the Millingstone Period (Horizon II). A shift in food procurement and processing practices occurred in this period that is reflected in the archaeological record. Plants and seeds were exploited to a much greater extent than before; but groups remained small and mobile and, based on the distribution of Millingstone sites, utilized mountain, coastal, and/or valley residences according to the season (known as seasonal rounds) (Glentis 2013). In this semi-sedentary pattern, a base camp would have been occupied for a portion of the year, but small population groups would occupy subsidiary camps seasonally in order to exploit resources not generally available near the base camp.

The Millingstone Period is characterized by ground stone milling tools, such as deep basin metates and manos used to grind seeds, nuts, and other hard plant materials into meal (Moratto 1984). Choppers, scrapers, and shell and bone artifacts are also found in Millingstone sites; however, projectile points are generally lacking, and faunal remains are scarce until later in the period (California Energy Commission 2007). Nearly 40 sites dating to Horizon II have been discovered, mainly in locations near the coast (Arnold and Walsh 2010). Evidence suggests that collecting shellfish and plant resources became more important than hunting during this period (Moratto 1984).

Intermediate Period

Dating to between 3,000 and 1,250 years BP, the Intermediate Period (Horizon III) represents a transitional period. Excavated sites retain many attributes of the preceding Millingstone Period but exhibit more elaborate and diverse artifact types in the deposits. Intermediate Period sites also can contain large-stemmed, small-notched projectile points suggestive of bow and arrow use and new technologies consisting of circular shell fishhooks and stone net weights (Arnold and Walsh 2010),

especially near the end of the Period. Intensive use of mortars and pestles signaled the special processing of acorns (leaching to make them edible) as the primary vegetative staple as opposed to a mixed diet of seeds and acorns (Chartkoff and Chartkoff 1984; Glentis 2013; NPS 2013b).

Due to a general lack of data, neither the settlement and subsistence systems nor the cultural evolution of this Period are well understood; but it is very likely that nomadic ways continued. It has been proposed that sedentism increased with the exploitation of storable food resources, such as acorns; but coastal sites from the period exhibit higher fishing activity than in previous periods. The first permanently occupied villages make their appearance during this period (Chartkoff and Chartkoff 1984). Habitation structures in most parts of southern California were simple but well-designed houses made of pole-and-thatch (Arnold and Walsh 2010).

Late Prehistoric Period

Extending from about 1,250 BP to European permanent settlement (ca. 1769), the Late Prehistoric Period (Horizon IV) is “the final episode in the development of Native California cultures before the settlement of Europeans” (Chartkoff and Chartkoff 1984: 203, 247). The period is marked by increased trade across landscapes, suggesting greater sociocultural complexity and interconnectedness (Glentis 2013). This period is also characterized by a slight increase in technological sophistication and diversity and, along the coast, greater exploitation of marine resources (Chartkoff and Chartkoff 1984; Moratto 1984).

Assemblages from this period characteristically contain projectile points. Toward the end of the period, the size of the points decreases and notched and stemmed bases appear, implying greater reliance on the bow and arrow. The presence of shell-bead money and personal shell-bead ornaments widely distributed well east of the coast (as far as New Mexico) suggests an organized trade network between coastal groups and inland villages (Chartkoff and Chartkoff 1984: 231). Village size increases during this period, with some of the settlements having as many as 1,500 or more persons. Analyses of human skeletons show that the first signs of malnutrition appear in this period as well, possibly signaling greater competition for food resources (Fagan 2003a).

With the arrival of the Europeans came an end to the autonomous Native California way of life. Starting with occasional contacts by land and sea in 1539-40, and then with permanent settlement in 1769, the foreigners brought with them new technology, new diseases, new religions and new economies, resulting in a loss of former lifeways (Chartkoff and Chartkoff 1984: 242).

3.4.1.2 *Historical Period (1769 to the Present)*

Native American Tribes at the Time of European Contact

The Los Angeles Basin is within the indigenous territory of the *Tongva*, who occupied the fertile lowland portions of southern California during protohistoric and historic times (Kroeber 1925; Arnold and Walsh 2010). The *Tongva* have been described as one of the most complex Native American societies in southern California (Bean and Smith 1978).

The *Tongva* may have entered the Los Angeles Basin as recently as 1500 BP. At the time of European contact, their land encompassed about 4,000 square miles of Los Angeles and Orange counties, encompassing the watersheds of the Los Angeles, Santa Ana, and San Gabriel rivers. Their territory also extended to the four southern Channel Islands – Santa Barbara, San Nicolas, Santa Catalina, and San Clemente (Bean and Smith 1978). Trade routes extended as far east as the Colorado River; and their trading partners included the Chumash to the north; the Cahuilla, Serrano, and Mojave to the east; and the Juaneños, Cupeño, and Luiseños to the south. Several other Native American groups including the Kawaiisu, Chemehuevi, Alliklik, Kitanemuk, Vanyume, and Serrano occupied the high desert portion of Los Angeles County. Those groups were fairly small, numbering between 500 and 1,000 people at the time of European contact (Kroeber 1925).

When the Spanish began to colonize southern California and construct missions in the late 1700s, the Tongva were forcefully relocated to Catholic mission lands. Some of the Tongva relocated to the Mission San Gabriel Archángel (established in 1771) and others to Mission San Fernando Rey de España, which was established in 1797. Because of this, the Tongva are also known variously by their Europeanized names – Gabrieliño, Fernandeano, or Nicoleño (those who lived on San Nicolas Island).

From the time of Spanish colonization forward the Tongva population decreased rapidly because of introduced diseases, the forceful relocations, changes in diet, and their resistance to Spanish rule. By 1900, “the Tongva had ceased to exist as a culturally identifiable group” (Bean and Smith 1978: 540). In 1994, the state of California recognized the Tongva as the aboriginal tribe of the Los Angeles Basin, but none of the four currently active Tongva groups are federally-recognized Tribes (Bureau of Indian Affairs 2014). As of December 2014, the Tongva population is approximately 1,700 members.

European Settlement

The first known European expedition to visit the southern California region was made in 1542 by Captain Juan Rodriguez Cabrillo, who was sailing up the coast looking for a new passage to Asia. Sixty years later, Captain Sebastián Vizcaíno, dropped anchor near San Pedro and at Santa Catalina Island. Europeans would not visit the region again until the Spaniard Gaspar de Portolá and a group of Catholic missionaries camped on what is now the banks of the Los Angeles River in 1769 (Kroeber 1925).

In September 1771, a Spanish colony that included Father Junipero Serra founded the Mission San Gabriel Archángel. The mission became the center of the first southern California community. At the time, the area was inhabited by small bands of Tongva Indians. Ten years later the Pobladores [townspeople] – a group of 11 families recruited from Mexico by Captain Rivera y Moncada – traveled from the San Gabriel Mission to a spot selected by Alta California Governor Felipe de Neve to establish a new pueblo. The settlement was named El Pueblo de la Reyna de Los Angeles (The Pueblo of the Queen of the Angels). The settlement was little more than a small, isolated cluster of adobe-brick houses; however, over time, it grew to be Ciudad de Los Angeles, “the City of Angels” (Cruz 1988; Nelson 1977; Weber 1982).

In September 1797, Franciscan monks established the Mission San Fernando Rey de España in the northern San Fernando Valley; and, by 1800, American ships began arriving at San Pedro and other ports along the California coast. The first English-speaking permanent residents settled near Los Angeles in 1818.

Alta California was ruled by Spain until 1822, when Mexico rebelled against Spain and established the Mexican Republic. The new Republic encompassed California and most of the southwestern United States. Under Mexican control, operation of the former mission properties transferred from the friars to civil authorities (Beattie and Beattie 1939); and, to encourage immigration to California, Mexico began granting land to private citizens. Huge land-grant ranches were established by 1834, with most of the Indians working on them as farm hands or herdsmen (Smith 1939). Trade between Mexico and the United States increased dramatically during this period; and by the 1840s, Los Angeles was the largest settlement in southern California. Cattle ranching dominated the economy, and cattle hides and tallow were valuable trade items (Pitt 1970).

By 1846, diplomatic relations had broken down between Mexico and the United States; and the U. S. Congress declared war on Mexico. The short war (1846-1848), ended with the signing of the Treaty of Guadalupe-Hidalgo, making California a territory of the United States. On September 10, 1850, California was admitted to the Union as a state (Beattie and Beattie 1939).

The California Gold Rush, Incorporation, and the Civil War

Both the annexation of California and the discovery of gold – most notably at Sutter’s Mill in 1848 – brought adventurers and immigrants to the West by the thousands. Gold strikes were also made, both in the Antelope Valley (as early as 1842) and in the mountains north of Los Angeles, all of which created a rapid increase in the population and a booming market for various goods and services – primarily beef, which was plentiful on the great Mexican ranchos (County of Los Angeles 2014a).

In 1850, the County of Los Angeles was formally established as one of the 27 original California counties. That same year, the City of Los Angeles was incorporated as the county’s first city and designated the County Seat. Because of its original enormous size, Los Angeles County was reconfigured three times, with a portion transferred to Kern County in 1851, a second portion transferred to San Bernardino County in 1853, and a final portion transferred to Orange County in 1889.

With the high demand for gold, silver, and copper during the Civil War (1860-1865), the area around Soledad Canyon became active; and Fremont’s Pass (today’s Newhall Pass, which connects the San Fernando and Santa Clarita valleys) was developed to speed up ore shipments. After the Civil War ended, many of the miners moved into the Los Angeles area, where several of the large Mexican ranches were subdivided into small farms. Among the transformed areas are what is known today as Compton, Downey, Norwalk, San Fernando, Santa Monica, and Pasadena.

Completion of the Transcontinental Railroad to the Pacific

Between 1880 and 1890, the population of Los Angeles County grew from approximately 11,000 to 50,000. This was due, in part, to the completion of the Southern Pacific and Santa Fe Railroad routes to the Pacific Coast and the settlement of hundreds of Chinese railroad workers hoping to start a new life in the area. With a huge investment in their new coast-to-coast rail lines and large Los Angeles land holdings, the railroads were able to promote tourism and support an emerging agriculture industry that included citrus, wheat, olives and dozens of other Mediterranean climate crops, most of which are still produced today (Moehring 2004; County of Los Angeles 2014a). Towns began to spring up along the new train routes, land speculators raced to the West, and land values boomed. After the railroad was completed between Los Angeles and Long Beach, the San Pedro and Long Beach harbors propelled Los Angeles into the international trade market.

In 1889, when some of the early speculation proved to be overly ambitious, the economy of the region dipped; but the slowdown was short-lived and led to other opportunities and innovations – most notably the creation of the Los Angeles Chamber of Commerce, which began a worldwide advertising campaign to attract new citizens and businesses. It also was during this period that several local irrigation districts were established and a number of civic improvements undertaken (County of Los Angeles 2014a).

The best known of the civic improvement projects was the completion of the Los Angeles aqueduct between the Owens Valley and Los Angeles. With periods of drought and a rapidly increasing population, the aqueduct became Los Angeles' solution to a growing need for water. The ambitious plan to channel water from the eastern slopes of the Sierra Nevada to Los Angeles was undertaken by William Mulholland, chief engineer of the Los Angeles Water Department, and J.B. Lippincott, of the United States Reclamation Service. The design phase began in 1899, and the voters of Los Angeles approved bonds for its construction in 1905 and 1907. Construction of the aqueduct took six years (1908-1913). When complete it was the world's longest aqueduct – 233 miles between Owens Lake and Los Angeles – and the largest single water project ever undertaken in the world (History Channel 2010; LADWP 2013).

The Oil Boom

Although oil was discovered near San Fernando as early as 1850, the commercial boom did not begin until 1892, when Edward Doheny and Samuel Canfield drilled their first successful well at the corner of West State and Patton Streets near the Second Street Park in downtown Los Angeles (Redpath 1900: 37-39; Valenzuela 2010). By 1897 the area had 500 derricks; and by 1910, the oil boom had tripled the population of Los Angeles from 50,000 to more than 319,000 (Testa 2005: 79-80). Drilling activity in the county reached new heights in the 1920s when major finds were also made in Whittier, Montebello, Compton, Torrance, and Inglewood. Among the strikes, the richest were in Huntington Beach in 1920 and Santa Fe Springs and Signal Hill in 1921 (County of Los Angeles 2014a). Between 1952 and 1988 more than 1,000 wells pumped 375 million barrels of oil from the Los Angeles derricks.

The oil industry continues to be a major part of the southern California economy, with approximately 19 oil fields operating within the Los Angeles City limits (Testa 2005; Masters 2011). Los Angeles is the most urban oil field in the United States, “operating in cracks, corners, and edges, hidden behind fences, and camouflaged into architecture, pulling oil out from under our feet” (Center for Land Use Interpretation 2010).

A Mecca for Immigrants

Since its initial settlement by the Spanish, southern California has been a cosmopolitan environment that has depended on long-distance immigration for its growth. Early Californios, Native American groups, and Anglo Americans of the 1800s were soon joined by settlers drawn to the area from across the globe; and by the early twentieth century, immigration was rising. By 1990, 27 percent of the region’s population and 33 percent of all those living in Los Angeles County had immigrated from Europe, Asia, and Central or South America, all contributing to the enormous cultural, economic, and social diversity of the region and the development of unique ethnic neighborhoods. By 2000, Los Angeles had become America’s major immigration port of entry, supplanting New York City (Waldinger and Bozorgmehr 1996; County of Los Angeles 2014a).

The Entertainment Industry

The first motion picture studio in Hollywood was housed in an old building at the southeast corner of Sunset Boulevard and Gower Street. At that time (1911), Hollywood had a population of about 500 and was little more than a post office, one hotel, and two grocery stores. What drew movie makers to the Los Angeles area, and ultimately Hollywood, was the varying terrain, the year-round good weather for filming, and a way to avoid penalties imposed on independent filmmakers by Thomas Edison’s Motion Picture Patents Company (located in New Jersey) (Hollywood Sign Trust 2014a). Film studios soon started popping up all over the Los Angeles area, including one for Cecil B. DeMille in 1913 and the Charlie Chaplin Studio in 1917. By the 1920s, millions of Americans were going to the movies each week, and the small town of Hollywood was growing rapidly. Whimsically-designed movie-set-inspired hotels and apartments were built along its broad boulevards, and movie stars were building elegant residences in the most prestigious areas. The rise of “the film aristocracy also meant suave new restaurants and nightclubs up and down Hollywood and Sunset Boulevards. Extravagant movie palaces completed the iconic Hollywood landscape” (Hollywood Sign Trust 2014b). Between 1927 and the mid-1950s – the “golden age of Hollywood” – there were five major studios: Paramount, RKO, 20th Century Fox, Metro-Goldwyn-Mayer, and Warner Brothers. Each had its own theater for showing films made only by their studios and only with actors who had exclusive contracts with those studios (Hollywood Movie Memories 2010).

With the advent of motion picture film sound, the movie industry reinvented itself; and “talkies” replaced silent films. When the stock market crashed in 1929 and the country fell into the depths of the Great Depression, Hollywood continued to boom as millions of Americans flocked to theaters to escape the grim news of the day.

The Hollywood Sign. When first erected in 1923, the famous Hollywood sign was an advertisement for a new residential development known as “Hollywoodland.” The sign was built by *Los Angeles Times* publisher Harry Chandler for \$21,000 and designed to last only about a year. The original design of the sign used four thousand 20-watt light bulbs to illuminate the perimeter of each of the 13 letters. At night the sign blinked on and off – first Holly, then Wood, then Land with an enormous period at the end of the word (Hollywood Sign Trust 2014e).

In the late 1930s, when television was just beginning to challenge big movie productions and radio, Don Lee – a local entrepreneur – constructed a broadcast network station on a 20-acre site just behind the Hollywoodland sign. Lee needed his station to be on high ground for line-of-sight communications; and, when completed in 1939, the facility had state-of-the-art filming facilities, a swimming pool, and a 300-foot lattice tower that was the “highest elevation television transmission tower in the world” (Hollywood Sign Trust 2014f). The original facility above the Hollywood sign, including the large radio tower, is still visible; and Hollywood continues to pay tribute to that important time in its history by calling the famous ridge “Mount Lee” (Hollywood Sign Trust 2014f).

World War II

When America entered World War II in 1941, Hollywood and its residents mobilized to support every aspect of war-time life. Studio trucks transported troops instead of movie sets, and some of Hollywood’s biggest stars – Clark Gable, Jimmy Stewart, Victor Mature – enlisted in the Army. On the big screen the light-hearted comedies and musicals of the previous decade were replaced with patriotic themes, and Film Noir was born. In later years of the war, Hollywood welcomed its returning soldiers home and worked together to feed, shelter, and entertain them (Hollywood Sign Trust 2014c).

Cold War Paranoia

When World War II ended, southern California in general and Hollywood in particular, underwent dramatic changes both politically and economically. The high-profile nature of the entertainment industry made it especially vulnerable to Cold War paranoia, and many of America’s favorite movie stars became the target of Senator Joseph McCarthy’s famous war on communist subversion. As many as 400 actors, writers, directors, and producers were “blacklisted” during this period; and some were even sentenced to prison. Combined with the growing popularity of television, box office receipts plummeted by almost half from the war years and film studios had to “slash payrolls, back lots sprouted weeds, and sound stages went dark.” In typical Hollywood fashion, the tight-knit community bounced back by adapting to the small screen; and by the mid-1950s, Hollywood had reinvented itself again (Hollywood Sign Trust 2014d).

During the Cold War Years, the U.S. Military also protected the Los Angeles area from Russian bombers by constructing a ring of 16 Cold War-era NIKE missile facilities, nine of which concealed missiles tipped with nuclear warheads. Active between 1954 and 1974, most of these military posts were unknown to the southern Californians, who lived among them as they silently protected their neighborhoods from

mountain peaks such as Mt. Disappointment and San Vicente Peak (*Los Angeles Times* 2000; Fort MacArthur Museum 1994-2013).

The Mid-Century Modern Movement

The Mid-Century Modern movement in architecture, arts, and science spanned the period from immediately after World War II (1945) through the 1970s (Randel 2013). During this period of rapid economic growth, new materials and bold and unusual colors, patterns, and designs affected almost everything that was built. The new contemporary approach was used in everything from furniture to housewares to clothing to residential, commercial, and industrial buildings (Achica Living 2015).

Always at the forefront of change, the Los Angeles area eagerly adopted this movement; and Los Angeles County produced some of the most prominent architects and artists in the history of design. Among these were Joseph Eichler, Frank Lloyd Wright, Richard Neutra, and Ray and Charles Eames, who married modern design with elements of nature to create some of the most iconic and enduring buildings and structures in the southern California landscape. Both in valley suburbs and the surrounding hills, the greater Los Angeles area still displays some of the most beautiful Mid-Century Modern designs produced during that era (Johnston 2014). Among these are the Los Angeles International Airport theme building; Dodger Stadium; the Faculty Center at the University of California, Los Angeles; the Capitol Records Tower; Century Plaza Towers; the Pacific Bell Telephone Building (AT&T Tower); and numerous individual homes and residential communities scattered across the Los Angeles basin (Roadside Architecture 2014).

3.4.1.3 Modern Los Angeles County

In 2015, more than 10.5 million people reside in Los Angeles County. The county encompasses 88 cities (Los Angeles County, Public Affairs, Chief Executive Office 2010) and approximately 140 unincorporated areas; it is one of the most culturally and ethnically diverse communities in the world. Additional information about the prehistory and history of the Project area can be found in the numerous documents cited at the end of this section.

3.4.2 Environmental Setting – Paleontological Resources

3.4.2.1 Geologic Overview

In general, the entire western margin of North America is very rich paleontologically. This is because the border of the North American continent is active tectonically, thus creating various marine embayments that received large amounts of sediment from the adjacent land mass. Each such embayment can have a sequence of stacked marine and terrestrial sediments containing the fossils documenting its natural history, and the completeness of the record can vary among different embayments. The Los Angeles Basin is a relatively important site for geological and paleontological studies of the western margin of North America because the stratigraphic sequence of its sediments is very complete; there are few gaps in a nearly continuous sequence of deposits from the Early Miocene (approximately 23 million years old) to the latest part of the Pleistocene (approximately 11,000 years old) (USGS 2007).

3.4.2.2 Geologic Units and Paleontological Resources

A brief description of the geologic units located within a 1-mile radius of each individual proposed Project site is provided below. The units are in approximate stratigraphic order from youngest to oldest. Table 3.4-2 indicates whether or not unique paleontological or geological resources are within the 1-mile radius of each proposed Project site. Additional information about paleontological resources is provided in Chapter 4 and Appendix B-4.

Table 3.4-2: Paleontological Sensitivity within a One Mile Radius of Each Proposed Project Site

Site ID	Site Name	Paleontological Sensitivity
AGH	Agoura Hills	X
AJT	AeroJet	X
ASD	Auto Square Drive	X
BJM	Black Jack Peak	N/A*
BUR	Burnt Peak	N/A
BUR1	Burnt Peak – 1	N/A
BUR2	Burnt Peak – 2	N/A
BUR3	Burnt Peak – 3	N/A
CPK	Castro Peak	X
DPK	Dakin Peak	N/A
ENC1	Encinal 1 (Fire Camp 13)	N/A
ENT	Entrada Tank Site	X
FRP	Frost Peak (Upper Blue Ridge)	N/A
FTP	Flint Peak	N/A
GMT	Grass Mountain	N/A
GRM	Green Mountain	X
H-17A	H-17A	X
H-69B	H-69B	X
JOP	Josephine Peak	N/A
JPK	Johnstone Peak – 1	N/A
JPK2	Johnstone Peak – 2	N/A
LACF072	County FS 72	N/A
LACFCP08	Camp 8	X
LACFCP09	County CP 9	N/A
LACFCP11	County CP 11	N/A
LARICSHQ	LA-RICS Headquarters Building	X
LEPS	Lower Encinal Pump Station	X
LPC	Loop Canyon	N/A
MMC	Mount McDill	N/A
MML	Magic Mountain Link	N/A
MTL2	Mount Lukens-2	N/A
OAT	Oat Mountain-1	X

Table 3.4-2: Paleontological Sensitivity within a One Mile Radius of Each Proposed Project Site

Site ID	Site Name	Paleontological Sensitivity
PASPD01	Pasadena Police Department	X
PDC	Pacific Design Center	X
PHN	Puente Hills	X
PMT	Pine Mountain	N/A
PWT	Portshead Tank	X
RIH	Rio Hondo	X
SDW	San Dimas	X
SGH	Signal Hill	X
SIM	Simpsons' Building	X
SPN	Saddle Peak	X
SUN	Sunset Ridge	N/A
SUN2	Sunset Ridge-2	N/A
TMT	Table Mountain	N/A
TOP	Topanga Peak	X
TPK	Tejon Peak	N/A
TWR	Tower Peak	N/A
VPK	Verdugo Peak-2	N/A
WAD	Walker Drive	N/A
WMP	Whittaker Middle Peak	N/A
WS1	100 Wilshire	X
WTR	Whittaker Ridge	N/A
ZHQ	Zuma Life Guard HQ	X

* N/A indicates that the project site is not sensitive for paleontological resources.

Artificial Fill (af)*Resource Potential – None*

Artificial fill is Holocene in age (11,000 years old or less) and consists of previously disturbed sediment that has been transported by humans (USGS 2007). It is commonly used in construction projects (structures, roadways, concrete channels, railway embankments, etc.). The depth and extent of these sediments within the proposed Project sites are unknown. By their very nature, fossils found in artificial fill have lost their native provenience and therefore have marginal scientific value. Based on the Society of Vertebrate Paleontology's (SVP) (2010) procedural guidelines, artificial fill is generally considered to have no potential to produce significant paleontological resources.

Quaternary Alluvium (Qa, Qg, Qf, Qs, Qbs, Qds, Qya, Qyf, Qc, Qos, Qae, Qof, Qop, Qoa, Qol, Qog, Qls)

Resource Potential – Low (Moderate/Unknown below 5 feet). Should be considered high potential in areas with previously recorded fossil localities.

Undifferentiated Quaternary alluvial deposits are laid down by fluvial processes (transported by water) and can be further subdivided by age into younger alluvium (Holocene age) and older alluvium (Pleistocene age). Holocene units have low paleontological potential within the initial 5 feet, and increase to moderate/unknown paleontological potential below 5 feet in depth below the ground surface based on SVP (2010) procedural guidelines and high potential in areas with previously recorded fossil localities. Pleistocene alluvium exposed at the surface or otherwise has moderate to high potential to produce significant paleontological resources, depending upon proximity in relation to known paleontological localities of the same age. These deposits are described in detail below.

Younger alluvium (Qa) includes surficial deposits that are Holocene in age (11,000 years old or less) and may overlie older units (USGS 2007). They occur as fan or fluvial deposits in all canyons and drainages as well in the lowest lying inland areas. These may also be described in literature and on maps as ‘axial channel deposits,’ ‘alluvial fan’ or ‘alluvial wash’ deposits. Composed of poorly consolidated alluvial gravel, sand, silts, and clay, they comprise valleys and floodplains and may be of variable color, though they are often tan to brown. In general, these deposits were laid down by the ephemeral streams that seasonally occupy drainages. Younger alluvium is typically assigned low paleontological potential; however, it may shallowly cover units of higher paleontological importance (Jahns 1954; McLeod 2014a). Quaternary alluvial-type units are found throughout the Project area.

Fossils are generally unknown from the younger alluvial deposits, although a few exceptions are mentioned in the records search results (McLeod 2014a). It should be noted that “this unit typically does not contain significant vertebrate fossils, at least in the uppermost layers, but it overlies older rocks that may contain significant vertebrate fossils at varying depths” (McLeod 2014a). Because of the young age and/or disturbed nature of these deposits, they have low potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Quaternary older alluvial deposits (Qos, Qae, Qof, Qop, Qoa, Qol, Qog) were formed during the Pleistocene (~2.68 million years [Ma] to 11,000 years old), and typically consist of river and stream derived sediments (USGS 2007). The sediments are composed of unsorted clay to pebble-sized clasts that may be oxidized to a reddish brown color and may contain reworked clasts of formations shed from adjacent hills, including igneous and metamorphic rocks. Taxonomically diverse and locally abundant Pleistocene animals and plants have been collected from older alluvial deposits throughout southern California and include mammoth, mastodon, camel, horse, bison, giant ground sloth, peccary, cheetah, lion, saber-toothed cat, capybara, dire wolf, and numerous taxa of smaller mammals (Jahns 1954; Cooper and Eisentraut 2002). Numerous Pleistocene fossil trackways have been documented in northern San Diego County. Older alluvial sediments are found throughout the Project area. These deposits may contain fossils of Pleistocene age. Older alluvium has moderate to unknown potential for

producing significant paleontological resources based on SVP (2010) procedural guidelines. The potential is elevated to moderate/high in areas of close proximity to known paleontological resource localities.

Landslide deposits (Qls) are formed by gravity-induced movement of sediment in areas with moderate to high terrain relief. They are formed from Quaternary or older sediments on unstable slopes and on older landslide deposits, and are generally unstratified. Lithologies of landslide deposits vary and are dependent upon the type of source rock. In general, landslides (and debris flows) are much less likely to contain well-preserved fossils than intact native sediments. Landslide sediments are often subjected to increased groundwater percolation, which tends to have a negative effect on the preservation of fossils; and gravitationally-induced movements of sediment can also destroy fossil remains through abrasion and breakage. Additionally, when the original stratigraphic position of the sediments is disturbed, varying degrees of information are lost in relation to the severity of changes to the slide mass. While paleontological resources may be found in these sediments, they have lost their native geologic context and, as such, are generally not considered scientifically significant (Jahns 1954; Cooper and Eisentraut 2002). These units are found throughout the Project area. Quaternary Landslide deposits have low potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Quaternary Shallow Marine Sediments (Qom, Qsp, Qtp, Ql, Qi, Qfu)

Resource Potential – High

These are nearshore marine deposits that range in age from Holocene (recent) to late Pleistocene (less than 125,000 years old) (USGS 2007). They commonly overlie wave-cut bedrock surfaces above the present sea level (Campbell et al. 2014). Older, Pleistocene-age deposits within these marine sequences have the potential to yield fossils. These include the late Pleistocene (Qom) deposits that have been known to preserve mollusks (Addicott 1964). Both terrestrial mammal remains that have been washed in and preserved within these deposits and marine mammals have been documented from age-equivalent deposits, including a mammoth and whale skeletons recovered from project sites located in southern California (Rugh 2009; Deméré 2013). These deposits have high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Saugus Formation (QTs, Tsr, Ts)

Resource Potential – High

The Saugus Formation is a nonmarine to shallow marine rock unit of Pleistocene age (approximately 2.5 Ma to 0.7 Ma; USGS 2007). It overlies the latest Miocene to Pliocene age Pico Formation (approximately 4 to 2 Ma; USGS 2007). The Saugus Formation is overlain by alluvial deposits in the Simi Valley region, where it reaches a thickness of 2,130 feet (Uhen 2014). It has been informally subdivided into an upper fluvial and deltaic facies and a lower shallow-marine facies (Squires 1997). The lower marine sandstone beds are known to have produced fossil marine mollusks, echinoderms, chondrichthyans (cartilaginous fish such as sharks and rays), aves (birds), mysticetes (baleen-bearing

whales), and odontocetes (toothed whales). The upper, terrestrial sandstone and conglomerate beds have yielded the fossilized remains of Pleistocene megafauna including tapir, horse, deer, and mastodon from the northwestern portion of the San Fernando Valley (Squires 1997; Hazzard 1940). The Saugus Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Hungry Valley Formation (Thvs)

Resource Potential – High

The terrestrial Pliocene age (approximately 5 Ma) Hungry Valley Formation, named by Crowell (1950), is an approximately 4,000-foot-thick sequence of gray to brown shale and coarse-grained sandstone (Miller and Downs 1974; Uhen 2014; USGS 2007). As part of the Ridge Basin Group, the Hungry Valley Formation (sandstone and conglomerate), the Peace Valley Formation (mudstone), the Ridge Route Formation (sandstone), and the Violin Breccia Formation (conglomerates) are located within the pull-apart basin between the San Andreas Fault to the northeast and the San Gabriel fault to the southwest (Dyer 2004; Crowell 2003b). There is a gradational contact between the Hungry Valley Formation and the underlying Peace Valley and Ridge Route formations (Crowell 2003a). The Hungry Valley Formation (sometimes not distinguished from the Peace Valley and Ridge Route Formation in the Project area) has been known to produce fossil mammals of Blancan North American Land Mammal “Age.” (NALMA) (Bass 1951; Miller and Downs 1974; McLeod 2014a).

Vertebrate fossils were initially reported in the Hungry Valley Formation by Chester Stock, former curator at the Natural History Museum of Los Angeles County, and were later described by Crowell (1950) (e.g., horse, tapir, rhinos, camel, and antelope). Additional vertebrate taxa were detailed in an unpublished Master’s thesis by Bass (1952) which included fish, turtle, rodent, and proboscidean fossilized remains. The Kinsey Ranch local fauna of Hemphillian age featured in the Miller and Downs (1974) publication was collected from the upper Peace Valley beds and the lower Hungry Valley Formation in northwestern Los Angeles County. This local fauna included the fossilized remains of reptiles, carnivores, proboscideans, horses, tapirs, rhinos, camels, and a new species of antilocaprid (Miller and Downs 1974). The Hungry Valley Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Peace Valley Formation (Tpv)

Resource Potential – High

The Miocene age Peace Valley Formation has five members, as named by Link (1982), listed here from oldest to youngest: Marple Canyon sandstone, Paradise Ranch shale, Osito Canyon shale, Cereza Peak shale, Posey Canyon shale, and Alamos Canyon siltstone (Crowell 2003a). The formation occurs in the southwestern portion of the fault-bounded Ridge Basin in northwestern Los Angeles County (Crowell 2003a). The Peace Valley beds are similar to and possibly correlative with those of the Anaverde Formation (Dibblee 1967). The Peace Valley Formation is composed of lacustrine shale and siltstone

lithologies representing depositional environments ranging from deep to shallow freshwater and deep brackish water (Smith 1982).

This unit is known to produce trace fossils, well-preserved fossil leaves, and mollusks, as well as vertebrate specimens, including the following taxa: cat, horse, camel, proboscidean, antelope, and turtle (Smith 1982; Miller and Downs 1974; Uhen 2014). The molluscan assemblage present within the upper Peace Valley Formation was determined to be 9 Ma (Crowell 2003a). The Peace Valley and the Ridge Route are age-equivalent and intertongue (Crowell 2003a). The Peace Valley Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Ridge Route Formation (Trr)

Resource Potential – Moderate/Unknown

The Miocene age Ridge Route Formation was named by Clements (1937) and is exposed in the northeastern portion of the Ridge Basin (Crowell 2003a). It has five members, listed here from oldest to youngest: Marple Canyon sandstone, Fisher Spring sandstone, Frenchmans Flat sandstone, Piru Gorge sandstone, and Apple Canyon sandstone (Crowell 2003a). The Ridge Route Formation consists of sandstone and conglomerate deposited by alluvial fans (Crowell 2003a). The beds within the Ridge Route and correlative Peace Valley formations dip more steeply than those of the overlying Hungry Valley Formation; however, in the vicinity of the San Andreas Fault, all of these beds are highly deformed and truncated (Link 1982). Fossils recovered from the Ridge Route Formation include mollusks, ostracods, plants, and trace fossils (Link et al. 1978; Uhen 2014). As this formation is age-equivalent to the Peace Valley Formation (described above) and could be difficult to distinguish from it in the field, the potential for adversely impacting paleontological resources is high. The Ridge Route Formation has moderate to unknown potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Anaverde Formation (Tas)

Resource Potential – High

The Late Miocene to early Pliocene age (approximately 9 to 5 Ma) Anaverde Formation consists of fluvial and lacustrine sedimentary deposits that occur north of the San Andreas Fault (Dibblee and Ehrenspeck 2001a; USGS 2007). Two informal members are recognized. They are the upper conglomeratic member and the lower calcareous sandstone member (Axelrod 1950; Dibblee and Ehrenspeck 2001a; and Noble 1953).

Paleontological resources recovered from the Anaverde Formation include well-preserved plant remains which are important paleoenvironmental indicators (Axelrod 1950; Wallace 1949). Fossils from University of California, Berkeley locality UCMP P4139 were featured in a publication by Axelrod (1950) which details the late Miocene flora of the Antelope Valley. Fossil plant impressions in the assemblage represent live oak woodland, chaparral, coastal sage, grassland, desert border, and arid sub-tropical communities (Axelrod 1950; SWCA 2008). The plant fossils occur in siltstone beds within the upper

portion of the formation (Wallace 1949). Two additional localities from the Antelope Valley have also yielded extensive plant and terrestrial vertebrate (e.g., horse, bird, carnivore, rabbit, rodent, and mastodon) fossils (McLeod 2008; Erwin 2008; City of Palmdale 1993; Axelrod 1950; Uhen 2014; Wallace 1949).

Although few resources for this formation have been published and it has a limited local extent, it has been assigned a high potential based on documented Los Angeles County Museum (LACM) localities in the Antelope Valley of Los Angeles County (SWCA 2008). Other unpublished paleontological mitigation reports for projects in the Los Angeles County area list the Anaverde Formation as having high potential to yield paleontological resources (SWCA 2008). Based on the above information, the Anaverde Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Fernando Formation (Tfsc, Tfp, Tfs, Tf, Tfr)

Resource Potential – High

The Pliocene to Pleistocene (3 to 1.8 Ma) is present in the eastern Puente Hills and much of the northeastern Los Angeles basin (USGS 2007). The formation has been divided into two members which are separated by an erosional unconformity. The lower member generally consists of a light grayish-brown to olive-brown siltstone and is massive to poorly bedded and micaceous. Several thin, lenticular pebble conglomerate beds are interbedded with the fine-grained strata and form prominent outcrops. The presence of this coarse-grained sediment within generally fine-grained strata suggests that the coarse basin margin sediments were transported to the deeper basin center by turbidity currents. While microfossils (foraminifers) are abundant, megafossils are comparatively rare in this member and consist primarily of gastropods, pelecypods, and brachiopods (Durham and Yerkes 1964).

The upper member is composed of light gray sandstone, pebbly sandstone, and interbedded sandy conglomerate consisting of sub-rounded to well-rounded pebbles of igneous and metamorphic rocks. The well-cemented matrix of the conglomerate is composed of white to yellowish brown coarse sandstone. The sandstone lithologies are poorly consolidated, fine- to coarse-grained, rarely well bedded, and sometimes graded; and they weather to yellowish-brown or reddish-brown. Numerous fossil localities have been documented within this member and consist of mollusks such as gastropods, bivalves, and scaphopods (Durham and Yerkes 1964).

Vertebrate fossils recovered from the Fernando Formation during construction of the Puente Hills Landfill include fossil fish (e.g., great white, *Carcharodon carcharias*; herring, *Ganolytes* sp.; hake, *Merluccius* sp.; lanternfish, *Diaphus* sp.; lanternfish, *Lampanyctus* sp.; swordfish, *Coelorhynchus scaphopsis*; mackerel, Scombridae; flounder, Pleuronectidae) and whale specimens (LACM localities 6350-6361; McLeod 2009; Gust and Scott 2009). Additional marine specimens of pinnipeds and dolphins, as well as mollusks and brachiopods have also been published from the Fernando Formation (Kellogg 1925; Koch et al. 2004; Uhen 2014). Terrestrial vertebrates include: ground sloth, *Paramylodon*; mastodon, *Mammuthus*; mammoth, *Mammuthus*; horses, *Plesippus* and *Equus*; camel, *Camelops*; the

pronghorn antelope, *Antilocapra americana*; and turkey, *Meleagris californica* (Koch et al. 2004; McLeod 2005). The Fernando Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Pico Formation (Tp, Tps)

Resource Potential – High

This marine latest Miocene to Pliocene (approximately 4 to 2 Ma) rock unit is informally subdivided into an upper and lower member (USGS 2007). The upper member is characterized by silty claystone, while the lower member is comprised of claystone, sandstone, and conglomerate (Cartwright, Jr. 1928). The Pico Formation, where it occurs in the vicinity of the Santa Susana Mountains near the Ventura and Los Angeles County line, is approximately 5,550 meters thick (Squires et al. 2006). Marine mollusk fossils are commonly preserved within the finer-grained units of the formation. Typical fossils include marine microfossils (e.g., *foraminifera*), invertebrates (e.g., pelecypods, gastropods, echinoderms, and the brachiopod *Terabratalia smithi*), and terrestrial and marine vertebrates (e.g., fish, seal, whale, and camel) (Kew 1930; Stewart and Stewart 1930; Blake 1973; Uhen 2014). Although vertebrate specimens are not well known, any vertebrate discoveries within the Pico Formation would be scientifically significant (McLeod, personal communication, September 8, 2014). Fossil assemblages described from the Valencia area have yielded a diverse molluscan fauna (Squires et al. 2006; Winterer and Durham 1962). The Pico Formation unit has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Towsley Formation (Ttog, Ttos, Ttoc)

Resource Potential – High

The late Miocene and Pliocene age (approximately 4 to 2 Ma) Towsley Formation includes siltstone, sandstone, and conglomerate (CGS 2009; Yerkes and Campbell 2005; USGS 2007). It represents a deep-water marine turbidite sequence and has been known to yield scientifically significant invertebrate and vertebrate fossils (Minch 1999; Uhen 2014). As with the Pico Formation described above, although vertebrate specimens are not well documented from the Towsley Formation, any additional vertebrate fossil discoveries from this formation would be of great scientific importance (McLeod, personal communication, September 8, 2014). The Towsley Formation unit has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Sycamore Canyon Formation (Tsc, Tscs, Tscg)

Resource Potential – High

This marine late Miocene rock unit, also known as the Sycamore Canyon Member of the Puente Formation, occurs in the elevated terrain of the Puente Hills near Whittier and Hacienda Heights (McLeod 2014a; Uhen 2014; USGS 2007). The Sycamore Canyon Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines. See below

for a description of the Sycamore Canyon Member of the Puente Formation and its paleontological resources.

Puente Formation (see Monterey Formation Tmlv, Tmps, Tmpy, Tmsc)

Resource Potential – High

Miocene and early Pliocene (approximately 13.5 to 3 Ma) marine rocks of the Puente Formation from oldest to youngest are as follows: La Vida Member (Tplv; Tmlv of Dibblee), Soquel Member (Tps; Tmps of Dibblee), Yorba Member (Tpy; Tmpy of Dibblee), and Sycamore Canyon Member (Tpsc; Tmsc of Dibblee; Dibblee and Ehrenspeck 2001b). The Puente is thought to be locally time-equivalent to the Monterey Formation (Cooper 1981; Critelli et al. 1995). Individual members of the Puente Formation are mapped by Dibblee within the County of Los Angeles as the Monterey Formation. The La Vida Member, the basal unit of the Puente Formation, is late Miocene in age (approximately 13.5 to 10 Ma) and consists of light gray to black, friable, massive to well-bedded siltstone (USGS 2007). This unit is up to 3,800 feet thick in the central portion of its range and is interpreted to be marine basin slope to outer submarine fan facies. This is part of the basal turbidite ‘megasequence’ that also contains the lower Mohnian-aged foraminifera (single-celled amoeboid protist) commonly found in the La Vida Member (Cooper 1981; Critelli et al. 1995; Uhen 2014).

Overlying the La Vida Member is the Soquel Member, the second member in the basal ‘megasequence’ of turbidite beds. This unit is late Miocene in age (approximately 13.5 to 7.5 Ma) and is generally composed of gray to yellowish-gray sandstone and siltstone (USGS 2007). Variable in texture and bedding size, poorly sorted sandstone beds are interbedded with matrix-supported pebble conglomerate beds. Thin interbeds of siltstone, ranging from yellow to gray, occur throughout this sequence. The Soquel Member is up to 3,100 feet thick at the center of its range, although it is thinner at its outer limits; and it is interpreted to represent a marine turbidite sequence of a middle to inner submarine fan facies. Fossils are scarce in this member; but foraminifera, fragments of fossilized wood, mollusks, bony fish, and shark teeth have been reported (Cooper 1981; Critelli et al. 1995; Durham and Yerkes 1964; Uhen 2014).

The Yorba Member is late Miocene in age (approximately 10 to 7.5 Ma), and generally consists of white to gray siltstone and sandstone with some gray-white to brick-red diatomaceous mudstone (USGS 2007). This unit is up to 3,000 feet thick at its center and is thought to consist of basin slope and basin plain facies. Fossils include benthic and pelagic foraminifera that indicate ocean depths of greater than 2,000 feet and numerous fish taxa (Cooper 1981; Cooper and Eisentraut 2002; Uhen 2014).

The youngest unit, the Sycamore Canyon Member, is late Miocene to Pliocene in age (approximately 7.5 to 2.9 Ma), and consists of several mappable subdivisions (USGS 2007). This member consists of light gray, massive to well-bedded silty gray shale, medium- to coarse-grained, white to rusty-brown sandstone, brownish-gray massive conglomerate, and light gray bedded pebble and cobble arkosic conglomerate. This member is up to 3,600 feet thick and is chiefly interpreted to represent basin slope to middle/inner submarine fan facies. Fossils from this portion of the formation include marine

invertebrates, marine and terrestrial vertebrates, and terrestrial plant remains (Cooper 1981; Cooper and Eisentraut 2002; Uhen 2014). At the Vellano Golf Course development located in the City of Chino Hills, a new species of kentriodontid dolphin was recovered during mass grading (Barnes et al. 2005). A replica of the relatively complete skeleton is now on display at the City of Chino Hills. Also preserved with the skeleton were stomach contents of its last meal, the extinct croaker fish *Lompoquia*. Over 1,000 fossil fish specimens were also recovered from the Vellano project site (Barnes et al. 2005). The entire Puente Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Sisquoc Shale/Modelo Formation (Tsq, Tsqs, Tud, Tuss, Tush)

Resource Potential – High

The Sisquoc Shale (also known as Sisquoc Formation or Modelo Formation) is a late Miocene and Pliocene age (approximately 6 to 4 Ma) marine sedimentary rock unit (Barron and Baldauf 1986; USGS 2007). This marine rock unit occurs in the elevated terrain of the Santa Susana Mountains region and is sometimes referred to as the Modelo Formation.

The Modelo Formation is the equivalent marine sedimentary rock unit exposed to the south (USGS 2007). It is approximately 1,970 feet thick and overlies the Calabasas Formation in the Simi Valley region. The lowest portion of the Modelo Formation is described as a silty sandstone indicative of a shallow marine environment. Benthic foraminiferal tests are preserved in this portion of the formation. The remaining upper portion of the Modelo Formation consists of diatomite derived from the siliceous tests of floating algae (diatoms) and is characteristic of a deeper water regime. Marine vertebrate (e.g., shark, bony fish, marine mammal, and terrestrial mammal) specimens have been recovered north of the Lompoc Hills and San Clemente Island from within the Sisquoc Shale. For example, desmostylian (*Paleoparadoxia*) fossils were recovered from localities LACM 1164 and 1676 from exposures of Sisquoc Shale on San Clemente Island (McLeod 2014a; Uhen 2014). Although whale specimens have also been recovered from the Modelo Formation, they have not been published (McLeod, personal communication, September 8, 2014). The Sisquoc Shale/Modelo Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Monterey Formation (Tmg, Tmv, Tma, Tmat, Tmy, Tm, Tmsh, Tmss, Tms, Tmsc, Tmc, Tml, Tmlv)

Resource Potential – High

The Monterey Formation is a well-studied rock unit that was deposited in a deep-marine environment and consists chiefly of mudstone, shale, diatomite, biogenic siltstone, and chert (Garrison and Douglas 1981). It ranges from 300 to 1,500 feet thick. The Monterey Formation is said to represent a condition rather than a laterally contiguous deposit – the condition being the opening of rift basins along the continental margin of coastal California during the Miocene (approximately 10 to 15 Ma) as the San Andreas Fault was forming and lengthening (Fritsche and Behl 2008; USGS 2007). The Monterey formation has been subdivided into three members by Woodring et al. (1946). From oldest to youngest,

these are: the Altamira Shale (15.5 to 13 Ma), the Valmonte Diatomite (13 to 6.9 Ma), and the Malaga Mudstone (6.9 to 3.5 Ma) (Brown et al. 2006; USGS 2007). The Monterey Formation has produced a wide variety of exquisitely preserved fossils of plants, invertebrates, and vertebrates, most which are of marine origin (Cooper and Eisentraut 2002). These include whales, dolphins, desmostylians, sea cows, sharks, bony fishes, marine and terrestrial plants, and diverse assemblages of marine invertebrates (Uhen 2014). A comprehensive list of taxa recovered from the Monterey Formation in the eastern Santa Monica Mountains is included in the records search results letter. Numerous publications are relevant to any consideration of the geology and paleontology of the Monterey Formation (Garrison and Douglas 1981; Schoellhamer et al. 1981; Raschke 1984a, 1984b; Raschke et al. 1988). The Monterey Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Castaic Formation (Tc)

Resource Potential – High

The Castaic Formation is a late Miocene age (approximately 11 to 25 Ma), marine sedimentary rock unit consisting of 7,000 feet of interbedded mudstone, siltstone, sandstone, and conglomerate that formed in a shallow-marine embayment northeast of the San Gabriel Fault at the eastern end of the Ventura Basin (Crowell 1954; Stanton 1982, 1966; Woodburne 1975; USGS 2007; Appendices B and C). The Castaic Formation, where it is mapped near Castaic Lake, consists of thickly bedded gray-tan-brown, fine-grained to coarse-grained sandstones. In this area, the Castaic Formation unconformably overlies strata of the Mint Canyon Formation and is overlain by strata of the Saugus Formation (Stanton 1982). According to Stanton (1966): “the sediments of the Castaic Formation were deposited at the margin of the transgressing late Miocene sea” and extend from central to southern California.

A diverse assemblage of fossil marine invertebrates, dominated by gastropods and bivalves, has been collected from the Castaic Formation (Govean 1993). Invertebrate fossils include foraminifers, sponges, bryozoans, barnacles, crustaceans, brachiopods, mollusks, and echinoids. Fossil marine vertebrates are rare but include sharks, rays, bony fish, and marine mammals (Stanton 1982; Uhen 2014). Additional fossils found in the Castaic Formation include fossil wood and leaves (Govean 1993). Other documented LACM localities have produced pinniped, sea turtle, and baleen whale specimens (McLeod 2013). North of Santa Clarita, a specimen of fossil tapir was discovered in a marine shell bed (McLeod 2013). Also in the nearby area, the Castaic Formation produced an exceptional carapace of leatherback turtle and a sea cow specimen (McLeod 2013). The Castaic Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Miocene Volcanics (Mva)

Resource Potential – None

These middle to late Miocene (approximately 11 to 5 Ma) extrusive volcanic rocks are non-sedimentary rock units that occur on Catalina Island, and have little potential to contain recognizable fossil remains

(Jennings 1962; USGS 2007). The composition of these rocks is andesitic (Jennings 1962). Extrusive igneous rocks such as volcanics have no potential for significant paleontological resources based on SVP (2010) procedural guidelines.

Igneous Rocks (db)

Resource Potential – None

These are middle Miocene (approximately 16 to 12 Ma) mafic intrusive igneous (diabase) rocks that formed deep within the Earth's surface at high temperature and high pressure and were then uplifted and exhumed by erosion (USGS 2007; Dibblee 1993). Intrusive igneous rocks have no potential for significant paleontological resources based on SVP (2010) procedural guidelines.

Glendora Volcanics (Tgva, Tgvf)

Resource Potential – None

These extrusive igneous rocks flows are Miocene in age (approximately 15-16 Ma) nonsedimentary rock units and have little potential to preserve recognizable fossil remains (Nourse 2002; Shelton 1955; Nourse et al. 1998; USGS 2007). They include massive rhyolitic to basaltic lavas with pyroclastic and volcanoclastic deposits (Shelton 1955). Extrusive igneous rocks such as volcanics have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Trancas Formation (Ttrc, Ttrs)

Resource Potential – Moderate/Unknown

The early Miocene Trancas Formation includes claystone, shale, sandstone, and breccia. The Trancas Formation is found only west of Point Dume on the coast south of Malibu (Yerkes and Campbell 1979; McCulloh and Beyer 2004). As it occurs, the Trancas Formation is approximately 950 feet thick and “bears some resemblance to parts of the Vaqueros and lower Topanga Canyon Formations exposed...near Point Mugu” (McCulloh and Beyer 2004; Dibblee and Ehrenspeck 1990; Yerkes and Campbell 1979). Saucian to Luisian Stage (approximately 22 to 13.5 Ma) microfossils (e.g., foraminifera) have been recovered from siltstone beds within this formation (Dibblee 1982; Koch et al. 2004; Uhen 2014; USGS 2007). Coastal sandstone deposits located southwest of Point Dume have yielded marine mollusks, including the gastropod *Turritella ocoyana* (Yerkes and Campbell 1979; McCulloh and Beyer 2003; Koch et al. 2004). The Trancas Formation has moderate to unknown potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Detrital Sediment of Lindero Canyon (Tlvc, Tlsc)

Resource Potential – Low

These sedimentary deposits are middle Miocene age (approximately 16 to 12 Ma) and correlative with a portion of the Topanga Formation (Weber 1984; USGS 2007). The conglomeratic facies (Tlsc) is described by Dibblee (1993) as “granitic detritus: light gray, composed of rounded pebbles, cobbles, and

small boulders of granitic and lesser metavolcanic rocks in incoherent sandstone matrix, and is massive to poorly bedded.” The lower, or basal conglomerate (Tlvc) consists of “detritus derived from the Conejo Volcanics.” (Dibblee 1993). According to Dibblee and Ehrenspeck (1993b) few fossils are documented from these deposits except for some shallow marine molluscan fossils. The Detrital Sediments of Lindero Canyon have low potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Topanga Formation (Ttui, Ttusi, Ttuc, Ttus, Ttusc, Ttush, Ttub, Ttucg, Ttbs, Ttsi, Ttsl, Ttc, Ttcg, Tts, Ttlc, Ttls, Ttlcv, Ttlsc, Ttlgvc)

Resource Potential – High

The Topanga Formation is a moderate to deep water marine deposit, consisting mainly of siltstone and sandstone. It has been divided into three distinct members: the lower Bommer (Ttlc, Ttls, Ttlcv, Ttlsc, Ttlgvc), the middle Los Trancos (Ttbs, Ttsi, Ttsl, Ttc, Ttcg, Tts), and the upper Paularino (Ttui, Ttusi, Ttuc, Ttus, Ttusc, Ttush, Ttub, Ttucg). The Bommer (Ttb) member is a thick sandstone unit, containing locally extensive crossbedding and preserving some marine invertebrate fossils and trace fossils. It is olive-gray to yellowish-brown and is generally thick-bedded, although thinner beds may be locally present. The sandstone beds tend to be moderately well indurated, although localized finer-grained beds may be softer (Miller and Tan 1976). The Los Trancos member is finer-grained, with interbedded sandstone and siltstone and mudstone beds that are generally gray to tan-brown, and with some trace fossils and abundant fossil plant remains. The siltstone and mudstone lithologies are not well indurated, but localized beds of sandstone may be more resistant (Miller and Tan 1976). The Paularino Member is a finer-grained deposit than either the Los Trancos or Bommer members and consist of siltstone and shale beds of varying colors with some finer sandstone. Tuffaceous beds are locally present, and some volcanoclastic sediments also occur locally and include andesite flows and andesite flow breccias in particular. The Paularino Member is generally well indurated, and the breccias and flows are well indurated (Miller and Tan 1976).

This formation has produced numerous significant fossil resources, including invertebrates and plants, as well as shark teeth, whales, sea cows, Desmostylus, sea lions, and others (Cooper and Eisentraut 2002; Uhen 2014). The basal conglomerate is described as being a distinct fossiliferous indicator bed in some areas (Fritsche and Behl 2008). The Topanga Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Conejo volcanics (aci, ai, Tcva, Tcvab, Tcvb, Tcvbp, Tcvbz)

Resource Potential – None

The Conejo volcanics are middle Miocene (approximately 14 Ma) in age and are “composed of extrusive igneous basaltic rocks exposed in the elevated terrain of the Santa Monica Mountains region” (McLeod 2014a; USGS 2007). This nonsedimentary rock unit has little potential to preserve recognizable fossil

remains. Extrusive igneous rocks such as volcanics have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Volcanics (Tva)

Resource Potential –None

These volcanic rocks are middle Miocene (approximately 16 to 12 Ma) in age and are similar to the Conejo Volcanics in the Encino Reservoir area (Dibblee and Ehrenspeck 1992b; USGS 2007). This nonsedimentary rock unit has little potential to preserve recognizable fossil remains. Extrusive igneous rocks such as volcanics have no potential for producing scientifically significant paleontological resources based on SVP (2010) procedural guidelines.

Intrusive rocks (bi)

Resource Potential – None

These middle Miocene (approximately 16 to 12 Ma) intrusive igneous rocks were formed deep within the Earth’s surface at high temperature and high pressure and were then uplifted and exhumed by erosion (USGS 2007). They consist of basalt-andesite dikes that have intruded into the Santa Monica Slate in this region (Dibblee and Ehrenspeck 1992b). Intrusive igneous rocks have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Basalt flows (Tb)

Resource Potential – None

This nonsedimentary rock unit has little potential to preserve recognizable fossil remains. Extrusive igneous rocks such as basalt flows have no potential for producing scientifically significant paleontological resources based on SVP (2010) procedural guidelines.

Simmler Formation (Tsi)

Resource Potential – Moderate/Unknown

The Simmler Formation is Oligocene to early Miocene in age. In the type area within the Caliente Range, it is characterized by a sandstone facies representing alluvial plain deposition. A conglomeratic facies represents alluvial fan deposition. The Simmler Formation is conformably overlain by the younger, middle Miocene-age Vaqueros Formation (Bartow 1974). The Caliente Formation (this report, Hill et al. 1958; Vedder 1968) is lithologically similar to the Simmler Formation. Few fossils have been recovered from this formation; but those include trace fossils, ostracods, plant remains, and very rare bone fragments (Bartow 1978; James 1963; Hill et al. 1958; Uhen 2014). The Simmler Formation has moderate/unknown potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Sespe Formation (Tsp, Tspc)*Resource Potential – High*

The middle Eocene and early Miocene age Sespe Formation (approximately 45 to 17 Ma) in northwestern Los Angeles County is a thick deposit (approximately 4,000 feet) of generally reddish sandstone, conglomerate, and siltstone, although parts of it are also described as gray sandstone and siltstone (Kew 1924; USGS 2007). It is non-marine, but it interfingers with the marine Vaqueros Formation (Belyea 1984; Belyea and Minch 1989; Lander 2002; Minch et al. 1989; Whistler and Lander 2003; and Calvano et al. 2003, 2008; USGS 2007). A large unconformity, or gap in stratigraphic continuity, exists within this formation, and represents a loss of approximately 7 Ma between the late Eocene and early Oligocene (Calvano et al. 2008). Moderately well-bedded, the sandstone often contains crossbedding and the siltstone and claystone are generally massive. This formation is generally poorly indurated, poorly sorted, and the sandstones are arkosic (Miller and Tan 1976). This formation reflects a major global drop in sea level and underlies or is mapped as undifferentiated from the Vaqueros Formation.

The land mammal assemblages are representative of the Uintan (late middle Eocene) and Arikarean to Hemingfordian (late Oligocene to early Miocene) NALMA (Calvano et al. 2008). Scientifically significant marine mammals (e.g., desmostylians, primitive whales, and the oldest sea cows) are well documented within the Sespe Formation (Calvano et al. 2008). As a result of construction development projects to the south in Orange County, the Sespe Formation has produced relatively diverse assemblages of land mammals including hedgehogs, canids, rabbits, rodents, horses, oreodonts, camels, and chevrotains (Calvano et al. 2008; Cooper and Eisentraut 2000; Fritsche and Behl 2008; Raschke 1984a; Uhen 2014). The Sespe Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Vasquez Formation (Tvb, Tvcd, Tvcg, Tvcs)*Resource Potential – Low*

The Vasquez Formation (late Oligocene to early Miocene; approximately 25 Ma) was formed by the deposition of prehistoric alluvial fans on mountain ranges that have now since eroded away (Harden 2004; USGS 2007). In Escondido Canyon, the Vasquez Formation has a composite thickness of approximately 8,800 feet (Noble 1953). Conglomerate, breccia, and basaltic flows are present in the lower portion of the section (CSULB 2014). Other published and unpublished paleontological reports on the Los Angeles County area list the Vasquez Formation as not being known to yield paleontological resources (Hendrix and Ingersoll 1987; SWCA 2008; Uhen 2014). The Vasquez Formation has low potential for producing paleontological resources based on SVP (2010) procedural guidelines.

Llajas Formation (Tll, Tlls, Tllg)*Resource Potential – High*

The marine Llajas Formation (early Eocene in age, approximately 54 to 50 Ma) lies stratigraphically below Neogene age sedimentary deposits (e.g., Topanga Formation, Monterey Formation, and Sisquoc Shale/Modelo Formation) that occur within the Project area (USGS 2007). The Llajas Formation contains gray, micaceous claystone and siltstone, some sandstone beds, and a cobble conglomerate composed of granitic, metavolcanic, and quartz clasts (Koch et al. 2004). The total thickness of the stratigraphic section first described by Cushman and McMasters (1936) is 1,720 feet. As mapped and described by Dibblee and Ehrenspeck (1992), the Llajas Formation is a “gray micaceous claystone-siltstone” with “some interbeds of light gray to tan soft sandstone.”

The Llajas Formation has yielded middle Eocene age fossils in the Santa Susana Mountains region (McLeod 2014b; Uhen 2014). One locality, LACM 7310, produced a specimen of bonito shark, *Isurus praecursor*, on the western side of Devil’s Canyon, as documented by Squires (1984). Another locality, LACM 6952, located on the east side of Las Llajas Canyon and west of locality LACM 7310, produced a specimen of ragged-toothed shark, *Odontaspis* (Squires 1984). Additional specimens from locality LACM 6952 were reported on by Squires in his later publication in 2001 and included a sand shark, *Striatolamia macrota*. Additional exposures of the Llajas Formation at the southern extent of Meier Canyon south of Simi Valley have produced specimens of the eagle ray *Myliobatis* (LACM locality 6953) (McLeod 2014b). The Llajas Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Juncal Formation (Tjsh)*Resource Potential – Moderate/Unknown*

The Juncal Formation is an early Eocene age (approximately 50 Ma) marine sedimentary rock unit (Squires 2008; USGS 2007). Approximately 5,500 feet in thickness, the type section for the Juncal Formation is located northeast of the Santa Ynez River and east of Agua Caliente Creek in Santa Barbara County (Vedder 1972; Page et al. 1951). Lithologies include siltstone, sandstone and conglomerate. The Juncal Formation is known for yielding well-preserved traces of annelid worms and fossils of a diverse collection of marine mollusks (e.g., gastropods and bivalves), crabs, cnidarians (jellyfish and their relatives), and microfossils (e.g., foraminifera) (Squires 1988, 2008; Uhen 2014; Vedder 1972). The Juncal Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Santa Susana Formation (TsuL, Tsu, Tsus, Tsur, Tsug, Tsl)*Resource Potential – Moderate/Unknown*

The Santa Susana Formation is a late Paleocene to early Eocene (approximately 65 to 56 Ma) marine rock unit. The overall thickness of the formation is 1,000 to 1,500 feet thick, composed of siltstone and

pebble conglomerate (Clark 1924; USGS 2007). At the base of the formation is a coarser cobble conglomerate with thin red claystone lenses (Koch et al. 2004). Preserved within the lower Paleocene strata of the Santa Susana Formation are planktonic and benthic foraminifera and mollusks (Heitman 1983; Koch et al. 2004; Yerkes and Campbell 1979; Uhen 2014). Also reported have been calcium carbonate lenses containing the turret snail, *Turritella pachecoensis* (Dibblee 1993; Dibblee and Ehrenspeck 1993b). Although fossil vertebrates are rare within the Santa Susana Formation, not much is known about this transitional Paleocene and Eocene period within California; thus, any vertebrate discoveries would be scientifically significant (McLeod, personal communication, September 8, 2014). The Santa Susana Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Tertiary Intrusive (Ti)

Resource Potential – None

These Tertiary (approximately 65 to 3 Ma) intrusive igneous rocks were formed deep within the Earth's surface at high temperature and high pressure and were then uplifted and exhumed by erosion. These rocks range from mafic (basalt) to felsic (rhyolite) in composition where they occur on Catalina Island, and their distribution within the project area is listed under Non-Sedimentary Rocks in Jennings (1962). These rocks have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Dike Rocks (TI)

Resource Potential – None

These possibly pre-Tertiary age (emplacement prior to 65 Ma) intrusive igneous rocks are andesitic and were formed deep within the Earth's surface at high temperature and high pressure and then uplifted and exhumed by erosion (Dibblee and Ehrenspeck 1991b; USGS 2007). Intrusive igneous rocks have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Chatsworth Formation (Kcg, Kcr, Kcs, Kss)

Resource Potential – High

The late Cretaceous age (75 to 70 Ma) Chatsworth Formation is approximately 6,000 feet thick in the Simi Valley region where it is unconformably overlain by the Simi Conglomerate (Squires 1997; USGS 2007). It is composed primarily of fluviially derived sandstone originating in the mountains to the south. The sandy sediments were then transported from the shoreline into deeper waters where they accumulated as submarine fan deposits (Squires 1997). Characterized by gray sandstone with mudstone interbeds, this formation weathers to a brown to reddish brown color (Squires 1997). The Chatsworth Formation is known to produce marine mollusks (e.g., bivalves, gastropods, ammonites, and scaphopods) (Squires 1981; Uhen 2014). The ammonites are reported to measure 2 feet in diameter (Squires 1997). Calcareous microfossils and nannofossils are also known to occur within this formation

and are useful paleoecological indicators. Trace fossils are also common (Squires 1981). The Chatsworth Formation has high potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Mixed Igneous (qd, gqd, ml, qm)

Resource Potential – None

These Mesozoic age (251 to 65 Ma) intrusive igneous rocks were formed deep within the Earth’s surface at high temperature and high pressure and were then uplifted and exhumed by erosion (Dibblee 1991, 1998; Dibblee and Ehrenspeck 1989, 1990, 1991a, 1991c, 1993a, 1993b, 1997, 1998; Dibblee and Minch 2002a, 2002b, 2002c, 2002d, 2002e, 2002f, 2002g, 2002h; USGS, 2007). Intrusive igneous rocks such as these units have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Franciscan Formation (KJf)

Resource Potential – None

The Franciscan Complex (Mesozoic) is the name for a suite of extremely deformed metasedimentary rocks located within the western portion of the Coast Range Province (Harden 2004). Due to the deformation and low grade metamorphism of this rock unit, it does not preserve scientifically significant fossil remains. The Franciscan Complex has no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Santa Monica Slate (sms)

Resource Potential – None

This Jurassic-age metamorphic marine rock unit has been deformed by contact metamorphism (Koch et al. 2004). Although marine invertebrates resembling the pelecypod (marine mollusk) *Buchia* are reported by Imlay (1963), the records search results from the Natural History Museum of Los Angeles County determined that “this metamorphosed rock unit will be devoid of any recognizable vertebrate fossil remains” (McLeod 2014a). The Santa Monica Slate has no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines.

Granitic Rocks (gr, grd)

Resource Potential – None

These leucocratic plutonic rocks are late Triassic (approximately 245 Ma) and older and were formed deep within the Earth’s surface at high temperature and high pressure and then uplifted and exhumed by erosion (Dibblee and Ehrenspeck 1998; USGS 2007). They range in composition from granite to granodiorite in composition (Dibblee and Ehrenspeck 1998). Intrusive igneous rocks such as granite have no potential for producing significant paleontological resources based on SVP (2010) procedural guidelines. Descriptions of the geological units listed above and their paleontological content.

3.4.3 Regulatory Setting

Because several of the 54 proposed Project sites are situated on federal lands and administered by different federal agencies, a brief discussion of the federal-level cultural resources and paleontological resources regulatory environment is provided within this EIR section.

3.4.3.1 *Federal Statutes and Regulations*

Cultural Resources

Numerous federal statutes, regulations, Executive Orders, Presidential Memoranda, and other directives outline the responsibilities of federal agencies for the protection of cultural resources and provide procedural guidelines for the management of federally owned or controlled properties, projects that are wholly or partially funded through federal mechanisms, or projects that require federal permits. Among the various federal mandates are the Antiquities Act, the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), the American Indian Religious Freedom Act (AIRFA), the Archaeological Resources Protection Act (ARPA), and the Native American Graves Protection and Repatriation Act (NAGPRA).

Antiquities Act of 1906

The Antiquities Act of 1906 [16 U.S.C. Part 431-433] authorizes the President to designate historic and natural resources located on federally owned or controlled land as National Monuments. The Act provides protection for prehistoric and historic ruins and objects by providing criminal sanctions against excavation, injury, or destruction of those resources. The Secretaries of the Interior, Agriculture, and Defense can issue permits to recognized educational and scientific institutions for archaeological investigations to professionally gather data of scientific value. Regulations for implementing the Antiquities Act can be found in 43 CFR Part 3. Antiquities Act permits (issued per 43 CFR Part 3) are rarely used today; this responsibility has been largely subsumed under permits issued per ARPA.

National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. Part 300101 et seq. [formerly 16 U.S.C. Part 470 et seq.]), is the cornerstone of federal cultural resources management law. The Act establishes a national historic preservation program that includes elements for identification, evaluation, and protection of cultural resources. The NHPA also encourages the conservation of historic properties – the term used to refer to “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) including artifacts, records, and material remains related to such a property or resource” – by directing federal agencies to assume responsibility for those cultural resources under federal jurisdiction judged to be significant.

The NHPA also authorizes the Secretary of the Interior (Secretary) to expand and maintain the NRHP, which is composed of historic properties – consisting of buildings, districts, sites, structures, and objects – determined significant in American history, architecture, archaeology, engineering, and culture. The

act directs the Secretary to set forth procedures for nominating historic properties to the NRHP by establishing criteria to determine those cultural resources that are eligible for inclusion. The term eligible for inclusion in the NRHP encompasses those properties formally determined as eligible and all other properties that meet the NRHP criteria as defined by 36 CFR Part 60.4. Properties that have not been formally evaluated under these criteria are treated as eligible until a final determination can be made. The Department of the Interior has issued guidelines [36 CFR Part 60] that describe identification and evaluation procedures for federal agencies to request determinations of eligibility [36 CFR Part 63].

The NHPA authorized the establishment of the Advisory Council on Historic Preservation (Council) as well, which acts as an independent federal agency to advise the President, Congress, and other federal agencies on historic preservation matters; to review the policies and programs of federal agencies; and to inform and educate federal agencies on matters relating to historic preservation. The NHPA also established the function of the State Historic Preservation Officer (SHPO) with duties including statewide inventory of historic properties, nominating properties to the NRHP, maintaining a statewide preservation plan, and reviewing undertakings for impacts on historic properties. In addition, the 1992 amendments to the NHPA established the potential for federally recognized American Indian tribes to designate a Tribal Historic Preservation Officer (THPO) who acts in the same capacity as the SHPO but has jurisdiction over tribal lands.

Section 106 of the NHPA [54 U.S.C. Part 306108, formerly 16 U.S.C. Part 470f] ensures that cultural resources are properly considered in the planning stage of any federal agency activity. Federal agencies are required to consider the effects of their undertakings on any properties eligible for inclusion in, or listed in, the NRHP during the planning stage and to provide the Council an opportunity to comment. This process is detailed in implementing regulation 36 CFR Part 800 (Protection of Historic Properties). Section 106 does not require that an undertaking be stopped, but reasonable efforts must be made to resolve adverse effects to eligible properties.

The reissued 36 CFR Part 800 regulation (effective January 11, 2001, and amended August 5, 2004) requires increased involvement with consulting parties. These consulting parties include the SHPO; the THPO when applicable; American Indian tribes; local governments; applicants for federal permits or licenses; and the public, including individuals and organizations which have a demonstrated interest in the outcome of any undertaking [36 CFR Part 800.2(c)]. The SHPO, in particular, has an important role because this agency is the first line of external review on federal actions requiring compliance with Section 106.

Section 110 of the NHPA states that the federal agency must assume responsibility for the preservation of historic properties that are owned or controlled by the agency and that the federal agency should use, to the maximum extent possible, historic structures that are available. Section 110 reinforces the responsibilities of the federal agency to inventory, evaluate, and preserve historic properties. It is the responsibility of the agency to establish a program to locate, inventory, and nominate to the Secretary all cultural resources that appear to qualify for inclusion in the NRHP. Each agency is required to ensure that no NRHP-eligible historic property is inadvertently transferred, sold, demolished, substantially

altered, or allowed to deteriorate significantly. If federal actions will substantially alter or destroy a NRHP-eligible property, sufficient time and effort must be expended to properly record the property. Additional planning and actions necessary to minimize harm to all National Historic Landmark sites must also be undertaken when a project may adversely affect such sites.

Section 111 of the NHPA complements the directives of Section 110 by addressing the responsibilities of a federal agency to implement appropriate adaptive uses, leases, exchanges, or management procedures for federal historic properties. Agencies are encouraged to implement adaptive uses for historic properties that are not needed for current or projected agency purposes. After consultation with the Council/SHPO, agencies may lease or exchange historic properties if the action is compatible with preservation.

Section 112 of the NHPA requires that all research, preservation, and protection activities be conducted by persons meeting professional standards developed by the Secretary of the Interior, including both agency and contractor personnel. Personnel responsible for the management of historic properties are not required to meet the Secretary's standards. All data produced by the research are to be maintained permanently in appropriate databases.

Section 304 of the NHPA authorizes the head of a federal agency to withhold from public disclosure any information about the location, character, or ownership of a NRHP-eligible property if that disclosure might cause invasion of privacy, might cause harm to the resource, or might impede the use of a traditional religious site by practitioners. Only a Freedom of Information Act (FOIA) filing can make such information available. It should be noted, however, that the release of any information requires consultation with the Secretary of the Interior and the Council.

National Environmental Policy Act

The National Environmental Policy Act (NEPA) of 1969 [42 U.S.C. Part 4321 et seq.] establishes a national policy that encourages harmony between humans and the environment. The act states that the Federal Government shall use all practicable means to preserve the productive harmony of the environment while fulfilling the social, economic, and other requirements of generations of Americans. Included in preserving the environment is the preservation of important historic and cultural aspects of our national heritage. The act requires all federal agencies to prepare a document, most commonly an environmental assessment (EA), which assesses the potential impacts of any proposed action on the environment. If impacts are judged potentially significant, an environmental impact statement (EIS) must be prepared. An EIS identifies any unavoidable adverse environmental effects, as well as alternatives to the proposed action and mitigation measures, prior to its implementation. NEPA's implementing regulations [40 CFR Parts 1500-1508] clarify that the act in no way directs, replaces, or supersedes the NHPA. However, an agency may decide to use the NEPA process for Section 106 purposes. If an agency decides that it will use the NEPA process for Section 106 purposes [36 CFR Part 800.8(c)], the agency must notify the SHPO/THPO and the Council that it will be doing so and meet the Standards for Developing Environmental Documents to Comply with Section 106 [36 CFR Part 800.8(c)(1)].

American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) of 1978 [42 U.S.C. Part 1996] states that it is the policy of the United States to “protect and preserve for American Indians their inherent right of freedom to exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites.” The provisions of AIRFA guarantee access to traditional sites on federal lands and noninterference with religious practices. Consultation under AIRFA with American Indian groups can simultaneously satisfy the requirements of NEPA as well.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 [16 U.S.C. Part 470aa et seq.] establishes that archaeological resources on public lands are part of the nation's heritage and should be preserved for the benefit of the American people. Unauthorized excavation, removal, damage, alteration, or defacement of archaeological resources on public lands is prohibited. ARPA sets forth criminal and civil penalties for such violations. The act requires a permit for any excavation or removal of archaeological resources from public lands that is not sponsored by the federal agency [16 U.S.C. Part 470cc (a)]. Such excavations must be of a scientific nature and must be conducted by qualified applicants. Individuals should comply with the Secretary's professional qualifications standards (48 Federal Register [FR] 44737-44740). All archaeological resources removed from public lands under the permit remain the property of the Federal Government.

The permit-granting authority usually belongs to the land manager responsible for the property. Although permits are not required for work contracted by the facility, a permit might be required for work conducted in investigations related to NAGPRA (e.g., recovery of American Indian human remains from a vandalized site). Acquiring a permit under ARPA regulations does not constitute compliance with Section 106 of the NHPA.

Federal agencies may withhold any information pertaining to the location of archaeological sites if the agency determines that disclosing such information would put the resource at risk (Section 304 of NHPA). This procedure, by itself, provides limited protection of such information. The use of Section 304 of the NHPA and ARPA to exclude the release of sensitive information on all archaeological sites, archaeological sites with a NAGPRA component, and sacred sites with an archaeologically defined component is the most effective procedural strategy [32 CFR Part 800 229.18(a)(1-2)].

ARPA's implementing regulations (32 CFR Part 229) specify that protected resources must be at least 100 years old and of archaeological interest. Surface collection of rocks, coins, bullets, and minerals, which are not located in an archaeological context, are excluded from protection. Paleontological specimens found outside archaeological contexts are not considered archaeological resources under ARPA and are similarly excluded from protection.

Native American Graves Protection and Repatriation Act

The purpose of the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (25 U.S.C. Part 3001-3013) is to set forth the rights of federally recognized American Indian tribal groups and Native Hawaiian organizations with respect to ownership of human remains, funerary objects, sacred objects, and objects of cultural patrimony with which they can demonstrate lineal descent or cultural affiliation. The act protects American Indian burial sites and controls the removal of human remains, funerary objects, sacred objects, and objects of cultural patrimony on federal, American Indian, or Native Hawaiian lands during planned or unanticipated excavations. NAGPRA requires that federal agencies and museums receiving federal funds inventory holdings for such remains and objects, and work with the tribal groups in a consultation process to reach agreements on the repatriation or other disposition of the remains and objects.

The stricter requirements of NAGPRA should be implemented in addition to Section 106 requirements when an undertaking has the possibility of impacting American Indian cultural resources; however, the two Acts are overlapping at times and need coordinating efforts. NAGPRA gives individuals and certain groups considerable decision-making authority in the excavation, removal, and repatriation of American Indian cultural items and burials. Excavation of American Indian cultural items and consultation with the appropriate federally recognized American Indian tribal groups should be undertaken as appropriate to NAGPRA legislation. Guidelines for procedures to follow upon unexpected discovery of American Indian human remains are set forth in implementing regulations of 43 CFR Part 10.4-6.

Federal Communications Commission Programmatic Agreements

Cultural resources activities associated with the proposed Project will also be conducted in accordance with two extant programmatic agreements (PAs) and the underlying laws and regulations upon which they are based. The two PAs apply specifically to wireless and broadcast facilities but do not apply on Tribal or federal lands (DeSordo 2011: 7). The two PAs are:

- National Programmatic Agreement for the Collocation of Wireless Antennas (FCC 2001) (Collocation Agreement), which was formulated to streamline the process for collocating antennas on existing towers and other structures to reduce the need for the construction of new towers. The Collocation Agreement constitutes a substitute for the FCC's compliance with the Advisory Council on Historic Preservation's regulations implementing Section 106 of the NHPA for the collocation of antennas as defined in the Collocation Agreement
- Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the FCC (FCC 2004) (Nationwide Agreement). The Nationwide Agreement was formulated to further streamline the NHPA's Section 106 process for facilities that were not excluded from Section 106 review under the Collocation Agreement.

Both of the PAs were developed through consultation among, and approved by, the FCC, the Council, and the National Conference of State Historic Preservation Officers.

Other Federal Agency Participation and Environmental Compliance

In addition to state, county, and municipal land owners, other federal agencies have jurisdiction over several of the proposed Project sites. Typically, towers that are constructed “on federal land require other agency permits with that agency taking the lead on environmental compliance” (DeSordo 2011: 13); however, agencies can also defer their compliance responsibilities to a single federal lead agency. Federal agencies associated with proposed Project sites include the U.S. Forest Service and the National Park Service (NPS). As Grantor, the Federal Emergency Management Agency (FEMA) is the federal lead agency under the National Historic Preservation Act. Coordination among all of these agencies and the FCC is ongoing.

Secretary of the Interior’s Standards. The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and the Secretary of the Interior's Guidelines for the Treatment of Historic Properties (Guidelines), are found on the National Park Service's website at <http://www.nps.gov/tps/standards.htm> and <http://www.nps.gov/tps/standards/four-treatments/standguide/index.htm> respectively. The Standards are a series of practices for maintaining, repairing, and replacing historic materials, as well as designing new additions or making alterations. The Guidelines assist in applying the complementary Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historical resource.

Paleontological Resources

If any federal funding is used to wholly or partially finance a project, a project occurs on federal lands, involves a federal permit, and/or includes a perceived federal impact, federal laws and standards apply and an evaluation of potential impacts on paleontological resources may be required. The management and preservation of paleontological resources on public and federal lands are prescribed under various laws, regulations, and guidelines.

The National Park Service Organic Act

The National Park Service Organic Act (16 United States Code (U.S.C.) | 2 3, and 4) states that national parks and monuments are to be managed “to conserve the scenery and the natural and historic objects... therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The statute also provides that “no natural curiosities, wonders, or objects of interest shall be leased, rented, or granted to anyone on such terms as to interfere with free access to them by the public.” Enforcement measures include a fine of up to \$500 or imprisonment not exceeding six months, or both. It has been U.S. Forest Service (USFS) policy since roughly 1998 to use the Organic Act for the permitting authority. This decision was based on the present case law that claims the Antiquities Act is vague with regard to paleontological resources because it does not explicitly define fossils as “objects of antiquity.” The Forest Service Training Guide for the Management of Paleontological Resources (USFS 2005) states that this act authorizes the use of National Forest System lands to qualified institutions and individuals for the collection of paleontological resources involving the excavation or removal of vertebrate fossil and significant invertebrate and plant

fossil resources when these activities are in the public interest for administrative, scientific or educational purposes.

Antiquities Act of 1906

In addition to the protection of cultural resources, the Antiquities Act of 1906 also has implications for paleontological resources. The Act states, in part:

That any person who shall appropriate, excavate, injure or destroy any historic or prehistoric ruin or monument, or any object of antiquity, situated on lands owned or controlled by the Government of the United States, without the permission of the Secretary of the Department of the Government having jurisdiction over the lands on which said antiquities are situated, shall upon conviction, be fined in a sum of not more than five hundred dollars or be imprisoned for a period of not more than ninety days, or shall suffer both fine and imprisonment, in the discretion of the court.

Although there is no specific mention of natural or paleontological resources in the Act itself, or in the Act's uniform rules and regulations (Title 43 Part 3, Code of Federal Regulations [43 CFR 3]), the term “objects of antiquity” has been interpreted to include fossils by NPS, BLM, USFS, and other federal agencies. Permits to collect fossils on lands administered by federal agencies are authorized under this Act; however, due to the large gray areas left open to interpretation due to the imprecision of the wording, agencies are hesitant to interpret this act as governing paleontological resources.

The National Environmental Policy Act

As with cultural resources, NEPA recognizes the continuing responsibility of the Federal Government to “preserve important historic, cultural, and natural aspects of our national heritage ...” (Sec. 101 [42 U.S.C. § 4321] (#382). With the passage of the Paleontological Resources Preservation Act (PRPA) (2009), paleontological resources are considered to be a significant resource, and it is therefore now standard practice to include paleontological resources in NEPA studies in all instances where there is a possible impact.

Federal Land Management and Policy Act of 1976

The Federal Land Management and Policy Act of 1976 (FLMPA) (43 U.S.C. 1712[c], 1732[b]); sec. 2) recognizes the value of our Nation's public lands and provides a framework in which those lands are managed in perpetuity for the benefit of present and future generations. This law defines significant fossils as unique, rare, or particularly well-preserved; an unusual assemblage of common fossils; being of high scientific interest; or providing important new data concerning [1] evolutionary trends, [2] development of biological communities, [3] interaction between or among organisms, [4] unusual or spectacular circumstances in the history of life, or [5] anatomical structure.

Paleontological Resources Preservation, Omnibus Public Lands Act

The Paleontological Resources Preservation, Omnibus Public Lands Act (PRPA 2009) (Public Law 111-011, Title VI, Subtitle D) directs the Secretaries of Interior and Agriculture to manage and protect

paleontological resources on federal land using “scientific principles and expertise.” PRPA incorporates most of the recommendations of the report of the Secretary of the Interior entitled Assessment of Fossil Management on Federal and Indian Lands (2000) in order to formulate a consistent paleontological resources management framework. In passing the PRPA, Congress officially recognized the scientific importance of paleontological resources on some federal lands by declaring that fossils from these lands are federal property that must be preserved and protected. The PRPA codifies existing policies of the BLM, NPS, USFS, Bureau of Reclamation, and U.S. Fish and Wildlife Service (USFWS), and provides the following:

- Uniform criminal and civil penalties for illegal sale and transport, and theft and vandalism of fossils from federal lands
- Uniform minimum requirements for paleontological resource-use permit issuance (terms, conditions, and qualifications of applicants)
- Uniform definitions for “paleontological resources” and “casual collecting”
- Uniform requirements for curation of federal fossils in approved repositories

Federal legislative protections for scientifically significant fossils applies to projects that take place on federal lands (with certain exceptions such as Department of Defense), involve federal funding, require a federal permit, or involve crossing state lines. This document does not specifically trigger any paleontological requirements, other than those under NEPA for project impact evaluations if there is a federal nexus.

United States Codes of Federal Regulations

7 CFR 3100.41(a). This section provides for the protection of paleontological resources under the authority of the Antiquities Act of 1906 (16 U.S.C. 431 et seq.).

36 CFR, Part 251, Subpart B. This subpart provides direction for special uses management on National Forest System lands, including paleontological resources.

36 CFR, Part 261, Subpart A. This subpart defines “paleontological resources.” It prohibits damaging or removing any natural feature, excavating, damaging, or removing any vertebrate fossil or removing any paleontological resource for commercial purposes without a special use permit; or excavating, damaging, or removing any cave resource from a cave without a special use authorization, or removing any cave resource for commercial purposes. When provided in an order, it is prohibited to go into any area closed for the protection of objects or areas of paleontological interest. Regulations may be issued by the Regional Forester, if delegated by the Chief, prohibiting acts or omissions within all or any part of the area over which he has jurisdiction for protection of objects or places of paleontological interest.

3.4.3.2 State Regulatory Setting

Cultural Resources

California Environmental Quality Act

CEQA applies to projects undertaken by, financially supported by, or involving the issuance of a lease, permit, or other approval by any state, regional, or local public agency. Guidelines for determining the significance of impacts on archaeological and historical resources are set forth in CEQA Guidelines Section 15064.5(b), which establishes rules for determining whether a project may have a substantial adverse effect on resources listed in, or meeting the criteria for listing in, the California Register of Historical Resources (CRHR) (i.e., “historical resources” as defined in California PRC section 21084.1 and CEQA Guidelines Section 15064.5(a)). As described in the CEQA Guidelines a resource shall be considered by the lead agency to be “historically significant” if the resource:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- 2) Is associated with the lives of persons important in our past;
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4) Has yielded, or may be likely to yield, information important in prehistory or history.

Resources included in a local register of historical resources (pursuant to PRC Section 5020.1(k)), or identified as significant in an historical resources survey (meeting the criteria in PRC Section 5024.1(g)), also are considered “historical resources” for the purposes of CEQA.

The fact that a resource is not already listed in, or eligible for listing in the CRHR, not included in a local register of historical resources, or identified in an historical resources survey, does not preclude an agency from determining that the resource may be an historical resource for the purposes of CEQA environmental review.

California Assembly Bill No. 52

California Assembly Bill (AB) 52 was signed into law on September 25, 2014, and applies to projects with an NOP issued on or after July 1, 2015. AB 52 adds Tribal cultural resources as an additional category of cultural resources that must be considered under CEQA. Tribal cultural resources are defined as either 1) “sites, features, places, cultural landscapes, sacred places and objects with cultural value to a California Native American tribe” that are included in the state register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the state register; or 2) resources determined by a lead agency, in its discretion, to be significant based on the criteria for listing in the state register. Under AB 52, a project that may cause substantial adverse changes in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the

environment. The NOP for the proposed Project was issued on August 19, 2014; therefore, the requirements of AB 52 do not apply; however, Native American consultation was undertaken as described in the following sections.

Native American Heritage Commission

The California Native American Heritage Commission (NAHC) was contacted on August 29, 2014, to request a search of their Sacred Lands Files and to acquire a list of Tribes that might be interested in the proposed Project sites. The NAHC responded on September 15, 2014, indicating that their records search failed to indicate the presence of Native American cultural resources in the immediate Project area. The NAHC also provided a list of nine Native American Tribes, organizations, or individuals who might have interest in the proposed Project sites, and each of these were contacted on June 29, 2015. One response was received from the Kizh Gabrieleño indicating that the entire Project area is within their Tribal territory. The Tribe requested to have one of their experienced and certified Native American monitors on site during any and all project-related ground disturbance.

FCC's Tower Construction Notification System

The FCC's Tower Construction Notification System (TCNS) was utilized to notify Tribes about each proposed Project site. Through the TCNS system, 14 Tribes were notified, and the appropriate path for consultation was provided by all but four Tribes. Additional TCNS responses were received from three Tribes. The Santa Ynez Band of Mission Indians (Chumash) deferred interest in all of the proposed Project sites to Tribes more local to Los Angeles County. Responses were also received from the Soboba Band of Luiseño Indians and Eastern Shoshone Tribes to whom follow-up information was provided. Coordination with the Soboba and Eastern Shoshone Tribes was completed as of December 3, 2015. The Soboba requested that an archaeologist or Native American monitor local to the Los Angeles County area provide archaeological monitoring during ground-disturbing activities at three project locations (AGH, ENT, and LEPS). The outcome of Tribal consultation and coordination is provided in Appendix B-4.

Paleontological Resources

California Environmental Quality Act

One of the questions listed in the CEQA Environmental Checklist is: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" (Appendix G, Section V, Part C.)

State of California Public Resources Code

The State of California Public Resources Code (Chapter 1.7), Sections 5097.5 and 30244, includes additional state level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on state lands, define the removal of paleontological "sites" or "features" from state lands as a misdemeanor, and prohibit the removal of any paleontological "site" or "feature" from State

land without permission of the jurisdictional agency. These protections apply only to State of California land, and thus apply only to portions of the project, if any, which occur on state lands.

3.4.3.3 Local Regulatory Setting

Cultural Resources

Los Angeles County

The County of Los Angeles Draft General Plan Conservation and Open Space Element (2014) contains goals and policies regarding historic and cultural resources. This Draft General Plan is currently under public review. The Conservation and Open Space Element establishes the goals of preserving and protecting sites of historical, archaeological, and scientific values, and defines the following policies relative to historic, cultural, and paleontological resources:

- Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.
- Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
- Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.
- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

The County of Los Angeles is also drafting an Historic Preservation Ordinance amending Title 22 - Planning and Zoning of the Los Angeles County Code to adopt regulations and conditions to preserve, protect, and enhance buildings, structures, and areas of historic interest and importance within the unincorporated territory of the County of Los Angeles, as authorized by Section 25373 of the California Government Code, for the purposes of perpetuating and preserving historic resources for the educational, cultural, economic and general welfare of the public.

Santa Monica Mountains Local Coastal Program

The Santa Monica Mountains Local Coastal Program (2014) is currently in the process of being approved by the State of California. As it is written, the Local Coastal Program Conservation and Open Space Element includes two goals (CO-8 and CO-9) and nine policies relating to historic and cultural resources. Goal CO-8 requires that the County engage in active preservation of the area's rich and diverse archaeological, paleontological and historic cultural resources in the Coastal Area. The nine policies within this document relate to this goal and the preservation of archaeological and historic resources.

- CO-199: Protect and preserve archaeological, historical, and paleontological resources from destruction, and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible.
- CO-200: Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.
- CO-201: Regulate landform alteration to ensure minimal disturbance of known archaeological and historic cultural sites. New development on sites identified as archaeologically sensitive shall include onsite monitoring of all grading, excavation, and site preparation that involve earthmoving operations by a qualified archaeologist(s) and appropriate Native American consultant(s).
- CO-202: The County should coordinate with appropriate agencies, such as the Southern California Indian Center (SCIC) and the University of California, Los Angeles (UCLA) Archaeological Center, to identify archaeologically sensitive areas. Such information should be kept confidential to protect archaeological resources.
- CO-203: New development within archaeologically-sensitive areas shall implement appropriate mitigation measures, designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission (NAHC).
- CO-204: Preserve and protect cultural resources and traditions that are of importance to Native Americans, including the Chumash and Gabrielino/Tongva People.
- CO-205: Prohibit the unauthorized collection of paleontological and historic cultural artifacts.
- CO-206: Notify all appropriate agencies, including Native American tribes, and the Department of Regional Planning of archaeological or paleontological resources discovered during any phase of development construction to ensure proper surface and site recordation and treatment.
- CO-208: New development shall, where feasible, protect significant historical buildings, landmarks, and districts because of their unique characteristics and contribution to the cultural heritage of the area.

Goal CO-9 requires that the County engage in increased public awareness of the history and cultural heritage of the Santa Monica Mountains. Two policies within this document relate to this goal and the preservation of archaeological and historic resources.

- CO-209: Support the development of resource-dependent uses designated to educate the public on the history and cultural heritage of the Santa Monica Mountains, where appropriate.
- CO-210: Provide to new residents and other persons seeking development approvals under this LUP, information on the history and cultural heritage of the Santa Monica Mountains.

Santa Catalina Island. The Santa Catalina Island Local Coastal Plan (1983) has four policies regarding cultural resources. The County of Los Angeles is to protect and restore all significant cultural resources, require archaeological studies and appropriate mitigation measures when cultural sites are encountered during development, require archaeological survey prior to ground disturbance by a qualified archaeologist, and prohibit the casual collection of cultural artifacts.

Incorporated Cities in the Project Area

City of Agoura Hills. The City of Agoura Hills has two goals regarding historic and archaeological resources in the General Plan (City of Agoura Hills 2010). Goal HR-1 requires the protection and maintenance of historic resources to foster stewardship and civic pride, which contributes to the unique identity and character of Agoura Hills. Three policies support this objective:

- HR-1.1: Enhance community appreciation of the importance of the City's historic sites and buildings and protect and preserve significant historical resources, to the extent feasible.
- HR-1.2: Ensure the maintenance of the physical quality of significant historic resources, particularly those elements contributing to their identity and role in the community.
- HR-1.3: Utilize Agoura Hill's historic resources as opportunities to educate and engage the community in cultural and civic activities.

Goal HR-3 requires the protection of significant archaeological and paleontological resources in Agoura Hills. Three policies support this objective:

- HR-3.1: Requires that the potential for archaeological and paleontological resources be considered prior to development of a property.
- HR-3.2: Requires that significant archaeological and paleontological resources be preserved in situ if feasible and that data recovery mitigation is implemented in the event that avoidance of impacts is not possible. Requires that excavation of deposits of Native American origin be coordinated with and monitored by recognized Chumash representatives.
- HR-3.3: Requires that if human remains or funerary objects are discovered and unearthed during any soil disturbing activity, the discoveries shall be treated in compliance with applicable state and federal laws, including notifying the County Coroner and the California Native American Heritage Commission, as appropriate, and following relevant procedures.

City of Beverly Hills. The City of Beverly Hills has two goals regarding historic preservation in the General Plan (City of Beverly Hills 2010) Historic Preservation Element. HP 1 states that the City will value and preserve significant cultural resources. The following eight policies relating to historic and archaeological resources support this goal:

- HP 1.1: Establish a local register of historic resources and develop criteria for locally significant resources that have local importance but which may not meet NRHP criteria.
- HP 1.2: Maintain an updated historic resources inventory.

- HP 1.3: Promote national, state, and local designation of historic resources.
- HP 1.4: Develop incentives to protect significant historic resources
- HP 1.5: Consider a tiered approach for regulating residential and non-residential historic resources.
- HP 1.6: Consider imposing penalties for illegal demolition of historic structures.
- HP 1.7: Explore options to establish a formally-funded historic archive
- HP 1.8: Temporarily suspend all earth disturbing activities within 100 feet of a potential resource to assess the significance of the find, and require appropriate mitigation before work resumes.

HP 2 states the City will promote the City's historic resources. In support of this, Policy HP 2.1 will develop educational programs on local historic resources.

The City of Beverly Hills also has a Historic Preservation Ordinance (Title 10-3-3201). The intent and purpose of this ordinance is to provide the ability to acknowledge, honor, and encourage the continued maintenance and preservation of those select properties in the City that, through exceptional architecture, contribute to the city's cultural history.

City of Calabasas. The City of Calabasas General Plan 2030, Cultural Resources Element (City of Calabasas 2009) states several objectives and policies. These are:

- Policy XI-1 ensures proper treatment of archaeological resources before development occurs at a site where such resources are present
- Policy XI-2 preserves significant archaeological and paleontological resources in-situ, when feasible. When avoidance of impacts is not possible, the policy requires data recovery mitigation for all significant resources. All forms of excavation in deposits of Native American origin shall be coordinated and monitored by representatives of the Chumash Nation.
- Policy XI-3 ensures proper treatment of historic resources before development occurs at a site where such resources are present, through enforcement of the City's Historic Preservation Ordinance.
- Policy XI-4 emphasizes preservation and adaptive reuse as the preferred approach to the management of historic properties. Where preservation or adaptive reuse is not possible, new development is required to reflect the character and historic/cultural references of the original features in their site context. Finally, facilitate the relocation of historic features if the preferred preservation in place is not possible.

City of Cerritos. The City of Cerritos has two goals regarding historic and cultural resources in the General Plan (City of Cerritos 2004) Conservation Element. CON-7 states that the City will promote community knowledge and appreciation for the heritage of the City. In support of this are two policies:

- CON-7.1 provides access to information on Cerrito's history.

- CON-7.2 encourages the involvement of the community in learning about the historic and cultural resources.

Goal CON-8 states that the City will enhance, preserve, and protect the City's historic and cultural resources. In support of this goal are two policies:

- CON-8.1 ensures that all items of historic and cultural significance are preserved for the enjoyment by all Cerritos residents.
- CON-8.2 requires all potential historic and cultural resources within the City be identified, recorded, mapped, and evaluated.

City of Chino Hills. The City of Chino Hills is situated within the southwestern-most corner of San Bernardino County. One proposed Project site, AJT, is situated within the jurisdiction of this city. The City of Chino Hills has one goal and two policies regarding historical and archaeological resources in the General Plan Update Conservation Element (City of Chino Hills 2014). Goal CN-2 is to protect Chino Hills' Cultural Resources and Policy CN-2.1 is to protect the City's archaeological resources. In support of this policy, Actions CN-2.1.1, CN-2.1.2, CN-2.1.3 and CN-2.1.4 require appropriate archaeological surveys during the environmental review process, on-site inspections by a qualified archaeologist during grading in areas where archaeological resources may be present, preservation of identified archaeological resources, and consultation with local Native American tribes.

Policy CN-2.3 is to protect the City's potential historical resources. In support of this policy, there are five actions:

- CN-2.3.1: Prior to a change of land use or other action on the Boys Republic property that could disturb a potential historic resource, require a historic resource survey of the property by a qualified historic resource consultant and consider incorporating any recommendations as requirements into subsequent development approval.
- CN-2.3.2: Prior to a change of land use or other action on the Tres Hermanos property that could disturb a potential historic resource, require a historic resource survey of the property by a qualified historic resource consultant and consider incorporating any recommendations as requirements into subsequent development approval.
- CN-2.3.3: Prior to grading on site of the original clubhouse of the 1925 Los Serranos County Club, require an appropriate archaeological survey to determine the presence of artifacts associated with the former Bridger/Gird Adobe site and consider incorporating any recommendations as requirements into subsequent development approval.
- CN-2.3.4: Consider placement of markers to acknowledge the local importance to Chino Hills' history of the Carbon Canyon and English Road equestrian communities.
- CN-2.3.5: For structures over 45 years old, review available City building records and make a determination regarding the structure's potential historical significance prior to permitting its demolition or substantial alteration.

City of Glendale. The City of Glendale's Open Space and Conservation Element of the City of Glendale General Plan (2005) has one policy regarding cultural resources. Policy 3 requires that the City recognize and maintain cultural and paleontological resources and structures, and that cultural resources be subject to judicious management.

The City's Historic Preservation Element has two goals regarding historic resources. Goal 1 is to preserve historic resources which define Glendale's community character. The following 12 policies support this goal:

- 1-1: Encourage support for the importance of history and historic preservation.
- 1-2: Recognize archaeological and historic resources as links to community identity.
- 1-3: Encourage the protection and preservation of archaeological sites and cooperate with institutions of higher learning and interested organizations to record, preserve, or excavate sites.
- 1-4: Require that archaeological surveys and/or monitoring be conducted prior to the issuance of construction permits in archaeologically sensitive areas of the city.
- 1-5: Temporarily suspend construction work when archaeological sites are discovered; establish procedures which allow for the timely investigation and/or excavation of such sites by qualified professionals as may be appropriate.
- 1-6: Discourage demolition of historic resources.
- 1-7: Encourage the preservation and maintenance of historic landscaped areas.
- 1-8: Encourage the preservation of individual historic resources and historic thematic and historic geographic districts.
- 1-9: Support the creation of historic districts of representative land use types such as residential, commercial, and industrial.
- 1-10: Support the preservation and maintenance of historic street furniture including street lights.
- 1-11: Ensure protection of historic resources through enforcement of existing codes.
- 1-12: Support comprehensive studies to discover unrecorded historic resources.

Goal 2 is to create and continue programs and practices which enable an appreciation of Glendale's history and historic preservation. The following 33 policies support this goal:

- 2-1: Identify representative architectural types and styles from various periods in history.
- 2-2: Survey all potential historic resources in Glendale.
- 2-3: Whenever indicated by research and authorized by the property owner, list significant historic resources in the Glendale Register of Historic Resources.

- 2-4: Develop a program to list all significant historic resources in the Glendale Register of Historic Resources.
- 2-5: Promote the use of the State Historical Building Code.
- 2-6: Provide historic preservation incentives for resource protection and continue to add more incentives as opportunities arise.
- 2-7: Establish and maintain a comprehensive inventory of Glendale's historic resource surveys.
- 2-8: Establish a program jointly with the Glendale Unified School District which will provide a curriculum which recognizes the importance of historic preservation.
- 2-9: Seek listing for appropriate properties on the National Register of Historic Places and the California State Register of Historical Resources.
- 2-10: Encourage the establishment of a city history museum.
- 2-11: Memorialize historic people, places, and events through a plaque program.
- 2-12: Complete historic resource surveys for the entire city targeting the most critical areas first.
- 2-13: Expand the base of historic information through the continued collection of anecdotal information in oral history interviews.
- 2-14: Conduct public information sessions to inform the public about the availability of incentives for designated historic resources in Glendale.
- 2-15: Develop a public outreach program which will demonstrate the benefits of historic preservation.
- 2-16: Establish a program which will preserve portions of historic resources, including façade features at their original sites.
- 2-17: Reuse existing historic architectural elements in new construction when preservation of historic resources is not feasible.
- 2-18: Support the preservation of street furniture in its original location.
- 2-19: Support the reuse of historic street furniture in historically appropriate settings when its original location is not feasible.
- 2-20: Develop an archive for historically important documents and artifacts.
- 2-21: Establish a program to recognize private efforts to preserve Glendale's history by proclamation.
- 2-22: Continue to consult with the state's Historical Resources Information Center by periodically updating the archaeological records search prepared for the city in 1997.
- 2-23: Encourage funding of historic preservation projects.

- 2-24: Establish a program for disseminating information of the provisions of the Historic Preservation Ordinance.
- 2-25: Establish a program for disseminating information of the restoration, rehabilitation, and renovation of historic resources.
- 2-26: Revise and update the Historic Preservation Element and the Glendale Register of Historic Resources at least every five years and review the implementation of policy objectives every two years.
- 2-27: Discourage relocation of historic resources.
- 2-28: Establish a program which will allow the relocation of historic resources within the city when onsite retention is not feasible.
- 2-29: Recognize achievements in historic preservation by individuals and groups through appropriate award programs.
- 2-30: Establish a program which requires mitigation monitoring to include payments of fees to subsidize preservation of historic resources a storage space for artifacts.
- 2-31: Participate in the statewide mitigation monitoring fund which would be used for the preservation of local resources.
- 2-32: Encourage the creation of a community based endowment fund which would benefit historic preservation.
- 2-33: Encourage sensitivity to Native American concerns and values involving aboriginal archeological sites; consult with representative Native American groups when prehistoric archaeological sites are discovered.

The City of Glendale also has a Historic Preservation Ordinance (Chapter 15.20), the purpose of which is to promote the health, prosperity, cultural enrichment, and general welfare of the people through the identification, designation, protection, enhancement, perpetuation, and use of historic resources that reflect significant aspects of the city's heritage. In addition, the City provides for the designation of historic districts in Chapter 30.25 through a change of zone that establishes a Historic District Overlay Zone.

City of Glendora. The City of Glendora's General Plan 2025 (City of Glendora 2008) Conservation Element (Chapter 8) provides an inventory of historic and cultural resources in the city and provides direction regarding the conservation, development, and utilization of these resources and the policies and programs to achieve them.

In addition, the City of Glendora's Municipal Code Section 21.03.050 promotes the identification, protection, enhancement, perpetuation, and use of improvements and areas within the city that reflect special elements of historical, architectural, archaeological, cultural, or aesthetic heritage (Subsection A). Subsections B through D of the Municipal Code state criteria for survey and establish criteria for

designating historic resources and landmarks. Requirements for the permitting of historic resources repairs and rehabilitation are found in Subsections E through I.

City of Los Angeles. The City of Los Angeles in Section 3 and Section 5 of the Conservation Element of the General Plan (City of Los Angeles 2001) contains objectives and policies regarding archaeological resources and cultural and historical resources. Section 3 requires that measures be taken to protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes. One policy and one program support this requirement. This policy requires that the City continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or are identified during land development, demolition or property modification activities. Section 5 requires that measures be taken to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes. One policy and four programs support this requirement. This policy requires that the City continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities. The four programs include:

- Program 1: development permit processing, monitoring, enforcement and periodic revision of regulations and procedures.
- Program 2: prepare the Historic Preservation and Cultural Resources Element of the general plan.
- Program 3: continue to survey buildings and structures of any age in neighborhoods throughout the City in order to develop a record that can be used in the present and future for evaluating their historic and cultural value as individual structures and within the context of surrounding structures.
- Program 4: continue to establish Historical Preservation Overlay Zones throughout the City.

The City of Los Angeles also has Historical Preservation Overlay Zones (HPOZ), Ordinance number 175891, found in Section 12.20.3 of the Los Angeles Municipal Code, the purpose of which describes the procedures for creation of new HPOZs, the powers and duties of HPOZ Boards, and the review processes for projects within HPOZs.

City of Malibu. The City of Malibu General Plan Conservation Element (1995) has one goal, one objective, and three policies and multiple implementation measures regarding historic, cultural and archaeological resource preservation. Con Goal 2 and Con Objective 2.1 are to preserve and protect cultural resources for future generations and scientific study. In support of this, Con Policies 2.1.1, 2.2.2, and 2.2.3 require that the City identify, designate, protect and preserve areas and sites of historic, cultural, and/or archaeological significance, that destruction of resources be avoided, and that the City provide incentives to property owners of historical structures to encourage preservation of designated cultural resources. Con Implementation Measures 76-84 outline specific actions to implement the policies, including, but not limited to, impact assessments, archaeological surveys, and formulation and implementation of project mitigation measures.

City of Monterey Park. The City of Monterey Park's General Plan (City of Monterey Park 2001) recognizes cultural resources as an important part of the community. The following goal and policies support the preservation of cultural resources for future generations:

Goal: To preserve the historical resources of Monterey Park

- Policy 3.1 – to support the efforts of the Historical Society, Historical Heritage Commission, and the Arts and Cultural Commission
- Policy 3.2 – to raise awareness about Monterey Park's history and cultural resources

City of Palmdale. The City of Palmdale has one goal, one objective, and eight policies regarding paleontological resources in the General Plan's Environmental Resources element (City of Palmdale 1993). Goal ER7 requires that the City protect historical and culturally significant resources which contribute to the community's sense of history. Objective ER7.1 states that the City shall promote the identification and preservation of historic structures, historic sites, archaeological sites, and paleontological resources in the City. The following eight policies support this objective:

- Policy ER7.1.1: Identify and recognize historic landmarks from Palmdale's past.
- Policy ER7.1.2: Promote maintenance, rehabilitation, and appropriate reuse of identified landmarks where feasible.
- Policy ER7.1.3: Require that new development protect significant historic, paleontological, or archaeological resources, or provide for other appropriate mitigation.
- Policy ER7.1.4: Develop and maintain a cultural sensitivity map. Require special studies/surveys to be prepared for any development proposals in areas reasonably suspected of containing cultural resources, or as indicated on the sensitivity map.
- Policy ER7.1.5: When human remains, suspected to be of Native American origin are discovered, cooperate with the Native American Heritage Commission and any local Native American groups to determine the most appropriate disposition of the human remains and any associated grave goods.
- Policy ER7.1.6: Cooperate with private and public entities whose goals are to protect and preserve historic landmarks and important cultural resources.
- Policy ER7.1.7: Promote recognition, understanding, and enjoyment of unique historical resources within the community by identifying resources through the use of landmark designation plaques, directional signage, self-guided tours, school curriculum, programs and event.
- Policy ER7.1.8: Discourage historic landmark properties from being altered in such a manner as to significantly reduce their cultural value to the community.

City of Pasadena. The General Plan of the City of Pasadena Land Use Element (City of Pasadena 2004) has one objective and one policy regarding archaeological resources. Objective 19 requires that the City

protect and enhance areas of the city containing important biological resources; protect and minimize disturbance of any important paleontological and/or archaeological resources that might remain in the city. Policy 19.3, Paleontological/ Archaeological Resources Survey, requires that project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving activities shall be monitored by a qualified professional who, if necessary, shall undertake salvage and curation. Any paleontological or archaeological resources recovered shall be documented and archived appropriately.

The City's General Plan Draft EIR (City of Pasadena 2015) Environmental Analysis Element has one goal and nine policies regarding historic preservation. Goal 8 requires the City's preservation and enhancement of Pasadena's cultural and historic buildings, landscapes, streets, and districts as reminders of its past and a source of community identity, and social, ecological, and economic vitality. Nine policies support this goal:

- LU 8.1: Identify and protect historic resources that represent significant examples of the City's history.
- LU 8.2: Provide assistance and support for applicants applying for designation of a historic resource through a clear, thorough, and equitable process that identifies if monuments, individuals, or landmark districts, historic signs or landmark trees are eligible for designation based on adopted evaluation criteria.
- LU 8.4: Encourage sensitive adaptive re-use
- LU 8.5: Promote an architecturally sensitive approach to new construction in Landmark and Historic districts.
- LU 8.6: Encourage street design, public improvements, and utility infrastructure that preserves and is compatible with historic resources.
- LU 8.7: Identify, protect, and maintain cultural and natural resources associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.
- LU 8.8: Continue to implement practices for historic preservation consistent with community values and conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, California Historical Building Code, state laws, and best practices.
- LU 8.9: Support maintenance and upkeep of historic resources to avoid the need for major rehabilitation and to reduce the risk of demolition, loss through fire, deterioration by neglect, or impacts from natural disasters.
- LU 8.10: Ensure that City enforcement procedures and activities comply with local, state, and federal historic preservation requirements and fosters the preservation of historic resources.

The City of Pasadena also has a Historical Preservation Ordinance found in Chapter 17 Section 62 of the Municipal Code. The purpose of which is to specify significance criteria for the designation of historic resources, procedures for designation, and review procedures.

City of San Dimas. The City of San Dimas has one goal, one objective, and one policy regarding paleontological resources in the General Plan Conservation Element (City of San Dimas 1991). Goal CN-2 is to conserve the historical and cultural resources of the City (including paleontological resources). Objective 2.1 is to promote the conservation of resources through programs and policies to both identify and protect resources. Policy 2.1.1 requires preservation of significant paleontological sites and evaluation of significance on a case-by-case basis.

City of Santa Monica. The City of Santa Monica General Plan (2010) Land Use and Circulation Element address Historic Preservation with four goals and associated policies regarding historic preservation. Goal LU12 encourages historic preservation citywide by preserving buildings and features which characterize and represent the City's rich heritage. The four policies include integrating the preservation of historic buildings into land use and planning practices, preserving and protecting historic resources through the development of preservation programs and economic incentives, promoting adaptive reuse of historic structures and sensitive alterations where changes are proposed, and recognizing adaptive reuse as a sustainable policy (Policy LU12.1 to 12.4).

Goal HP1 is to preserve and protect historic resources in Santa Monica through the land use decision-making process. The following ten policies support this goal.

- HP1.1: Follow policies for historic preservation contained in the Historic Preservation Element when making land use decisions.
- HP1.2: Maintain and regularly update the Historic Resources Inventory.
- HP1.3: Ensure that new development, alterations or remodeling are sensitive to historic resources and are compatible with the surrounding historic context.
- HP1.4: Continue to support Landmarks Commission review and public input for all structures proposed for demolition that are more than 40 years old.
- HP1.5: Support rehabilitation and restoration of historic resources through flexible zoning policies and modifications to development standards
- HP1.6: Promote awareness of adopted historic preservation policies and the greenhouse gas reduction value of historic preservation and adaptive reuse.
- HP1.7: Develop tools to address the conservation of unique and valued character-defining features in residential neighborhoods to preserve and enhance the existing architecture, scale, landscape and context.
- HP1.8: Encourage the preservation and regular maintenance of mature trees and landscaping that contribute to the unique character of a neighborhood.

- HP1.9: Promote the availability of financial incentives for historic preservation.
- HP1.10: Review proposed developments for potential impacts on unique archaeological resources, paleontological resources, and incorporate appropriate mitigation measures to protect or document the resource.

Goal HP2 is to preserve and protect historic resources through the development of economic incentives and neighborhood conservation approaches. In support of this goal are the following four policies.

- HP2.1: Establish a program for the Transfer of Development Rights for specified categories of significant historic resources and character defining structures, which will be considered a community benefit. Identify receiving areas such as boulevards, transit corridors, activity centers, and Districts.
- HP2.2: Pursue and support a conservation easement program to allow owners of historic properties to earn a one-time income tax deduction through the donation of a property easement to a qualified preservation organization.
- HP2.3: Establish a Neighborhood Conservation Overlay Districts where appropriate.
- HP2.4: Continue to encourage the preservation of homes with historic and architectural significance.

Goal HP3 is to integrate historic preservation practices into sustainable development decisions. In support of this goal are the following four policies.

- HP3.1: Develop incentives to encourage preservation and adaptive reuse of historic buildings as a means of reducing the use of raw materials and realizing sustainable development goals.
- HP3.2: Ensure that the promotion of sustainability technologies, such as solar panel installations and sustainable retrofitting are incorporated in such a way as to not adversely impact historic resources.
- HP3.3: Incorporate conservation of historic resources located within the boundaries of specific plans into the Plan's overall design.
- HP3.4: Support the inclusion of historic preservation as a community benefit in development above the base.

The City of Santa Monica also has a Landmark and Historic District Ordinance found in Chapter 9 Section 36 of the Municipal Code, the purpose of which is to (a) Protect improvements and areas which represent elements of the City's cultural, social, economic, political and architectural history; (b) Safeguard the City's historic, aesthetic and cultural heritage as embodied and reflected in such improvement areas; (c) Foster civic pride in the beauty and noble accomplishments of the past; (d) Protect and enhance the City's aesthetic and historic attractions to residents, tourists, visitors, and others; and (e) Promote the use of Landmarks, Structures of Merit, and Historic Districts for the education, pleasure, and welfare of the people of this City.

City of Signal Hill. The City of Signal Hill General Plan (1989) Environmental Resources Element has one goal and two policies regarding cultural and historic areas. Goal 2 requires the City to maintain and enhance the City's unique cultural, aesthetic, and historic areas. The two policies supporting this goal include protecting and enhancing the State Historical Landmark at the Alamitos Well Site #1 and protecting and enhancing architectural resources in the City consistent with their significance and importance.

City of West Hollywood. The City of West Hollywood General Plan (2011) Historic Preservation Element has six goals and 24 policies regarding historic preservation. Goal HP-1 expands the base of information on the City's history by working with partners to program, curate, and support the West Hollywood Room and to protect and preserve its heritage, develop an archival policy and archive of historic documents, and maintain an internal resource center containing a collection of relevant historic documents.

Goal HP-2 continues to identify and evaluate cultural resources by revising and updating the West Hollywood Historic Resources Survey, seeking designation of eligible properties as West Hollywood Cultural Resources and/or Historic Districts, and provide assistance in applications for designated West Hollywood Cultural Resources to be nominated as properties in the CRHR and NRHP.

Goal HP-3 protects cultural resources from demolition and inappropriate alterations. This is accomplished through the following policies:

- HP-3.1: Revise and update the Historic Preservation Element of the West Hollywood General Plan on a regular basis.
- HP-3.2: Ensure the protection of cultural resources through enforcement of existing codes.
- HP-3.3: Continue to coordinate Section 10 procedures with other environmental review procedures.
- HP-3.4: Continue to allow for the adaptive reuse of cultural resources.
- HP-3.5: Develop post-disaster policies and plans for designated cultural resources to encourage preservation of damaged cultural resources.
- HP-3.6: Suspend development activity when archaeological resources are discovered during construction. The project will be required to retain a qualified archaeologist to oversee the handling of resources in coordination with appropriate local and state agencies and organizations and local Native American representatives, as appropriate.
- HP-3.7: Continue to coordinate with the City staff from various fields so that historic preservation goals are recognized.

Goal HP-4 increases the public's awareness of the City's history and cultural resources by educating the public about the history of West Hollywood; memorializing significant people, places, and events through plaques and public art; and maintaining information on cultural resources on the City website.

Goal HP-5 promotes the preservation of cultural resources through maintenance and rehabilitation incentives and technical assistance. This is accomplished through the following policies:

- HP-5.1: As feasible, maintain a resource library that includes technical information on the treatment of historic properties.
- HP-5.2: Consider providing relief from some taxes and fees for preservation projects.
- HP-5.3: Explore new sources of revenue such as grants and loans that can be used for the maintenance, rehabilitation, or restoration of cultural resources or operating the City's preservation program.
- HP-5.4: As feasible, evaluate City programs for opportunities to underwrite the maintenance, rehabilitation, or restoration of cultural resources.
- HP-5.5: Consider reevaluating the usefulness of the Transfer of Development Rights Program.
- HP-5.6: Consider directing capital improvements funds towards the preservation and enhancement of cultural resources and historic districts.

Goal HP-6 uses historic preservation concepts as tools for economic development by seeking opportunities to work with business and professional groups to incorporate cultural resources into their promotions of business and tourism and incorporates goals and objects related to cultural resources into public and private plans for economic development.

The City of West Hollywood also has a Cultural Preservation Ordinance found in Chapter 19 Section 58 which provides a high level of protection to designated cultural resources.

City of Whittier. The City of Whittier has three goals and eight policies regarding cultural resources in the General Plan Historic Resources Element (City of Whittier 1993). Goal 1 is to determine the nature and extent of the City's cultural heritage by identifying buildings, sites, objects, neighborhoods, landscaped areas, and gardens which have special significance to the history and/or character of Whittier and requiring evaluation of the potential for archaeological and paleontological resources during the environmental review phase of development projects (Policy 1.1 and 1.2).

Goal 2 is to develop an historic resources preservation program, recognizing that effective utilization of the City's historic resources supports community identity and appeal, social and economic vitality, and neighborhood stability. In support of this goal are the following four policies.

- Policy 2.1: Update the City's historic resources ordinance as needed to protect identified historic buildings, sites, trees, gardens, and neighborhoods.
- Policy 2.2: Establish Historic Districts, as appropriate, to protect Whittier's historic neighborhoods and to preserve and enhance the distinctive visual and functional image of Whittier.

- Policy 2.3: Encourage new development near historic structures, sites, or districts to be compatible with the existing significant structures in scale, material, and character.
- Policy 2.4: Encourage the preservation of open areas around historic buildings.

Goal 3 is to promote public awareness of Whittier's history and heritage by promoting, encouraging, and assisting efforts to educate the public about the history, heritage, and resources of Whittier and provide information to the public on tax incentives and financing available for historic preservation activities (Policy 3.1 and 3.2).

The City of Whittier also has the Historic Resources Ordinance found in Chapter 18 Section 84 which provides a high level of protection to designated cultural resources.

Paleontological Resources

Los Angeles County

The County of Los Angeles General Plan Conservation and Open Space Element (1980) contains goals and policies regarding paleontological resources. This general Plan is currently under revision and is expected to have more specific guidance regarding paleontological resources in the updated version. The Conservation and Open Space Element establishes the goals of preserving and protecting sites of historical, archaeological, and scientific values and defines the following policies relative to paleontological resources:

- Protect cultural heritage resources, including historical, archaeological, paleontological, and geological sites
- Encourage public use of cultural heritage sites consistent with the protection of these resources
- Promote public awareness of cultural resources
- Encourage private owners to protect cultural resources

Santa Monica Mountains Local Coastal Program

The Santa Monica Mountains Local Coastal Program (2014) is currently in the process of being approved by the State of California. As it is written, the Local Coastal Program Conservation and Open Space Element includes one goal and four policies relating to paleontological resources. Goal CO-8 requires that the County engage in active preservation of the area's rich and diverse archaeological, paleontological, and historic cultural resources in the Coastal Area. Four policies within this document relate to this goal and the preservation of paleontological resources. The goals require that the County in the Coastal Area protect and preserve archaeological, historical, and paleontological resources from destruction and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required. Mitigation shall be designed to accord with guidelines of the State Office of Historic Preservation and the State of California Native American

Heritage Commission. This document also prohibits the unauthorized collection of paleontological and historic cultural artifacts. Finally, the County must notify all appropriate agencies, including Native American tribes, and the Department of Regional Planning of archaeological or paleontological resources discovered during any phase of development construction to ensure proper surface and site recordation and treatment.

Incorporated Cities in the Project Area

City of Agoura Hills. The City of Agoura Hills has one goal and two policies regarding paleontological resources in the General Plan (City of Agoura Hills 2010). Goal HR-3 requires the protection of significant archaeological and paleontological resources in Agoura Hills. In support of this objective, Policy HR-3.1 requires that the potential for archaeological and paleontological resources be considered prior to development of a property. Policy HR-3.2 requires that significant archaeological and paleontological resources be preserved in situ if feasible and that data recovery mitigation is implemented in the event that avoidance of impacts is not possible.

City of Beverly Hills. Policy HP 1.9 of the City of Beverly Hills General Plan (2010) Historic Preservation Element states that in the event excavation reveals paleontological resources, earth-disturbing work will be suspended until the resource is evaluated; and work can resume only after the find has been appropriately mitigated.

City of Calabasas. The City of Calabasas has two objectives and one policy regarding paleontological resources in the General Plan (City of Calabasas 2008). The City's objectives are to enhance the community's appreciation of the importance of archaeological and paleontological resources and to protect significant resources. In support of this, Policy XI-2 requires that significant archaeological and paleontological resources be preserved in situ if feasible and that data recovery mitigation is implemented in the event that avoidance of impacts is not possible.

City of Cerritos. The City of Cerritos General Plan Conservation Element (City of Cerritos 2004) has one goal and two policies regarding cultural resource preservation. Per the City's General Plan EIR (2004), cultural resources include both archaeological and paleontological resources. Goal CON-8 is to enhance preserve and protect the City's historic and cultural resources by ensuring that all items of historic and cultural significance are preserved (Policy CON-8.1) and that all potential resources are identified, recorded, mapped, and evaluated (Policy CON-8.2).

City of Chino Hills. The City of Chino Hills has one goal, one policy, and three actions regarding paleontological resources in the General Plan Update (City of Chino Hills 2014). Goal CN-2 is to protect Chino Hills' Cultural Resources and Policy CN-2.2 is to protect the City's paleontological resources specifically. In support of this objective, Actions CN-2.2.1, CN-2.2.2, and CN-2.2.3 require appropriate paleontological surveys during the environmental review process, on-site inspections by a qualified paleontologist during grading in areas where paleontological resources may be present, and that identified paleontological material be preserved.

City of Glendale. The City of Glendale's Open Space and Conservation Element of the City of Glendale General Plan (2005) has one policy regarding paleontological resources. Policy 3 requires that the City recognize and maintain cultural and paleontological resources and structures and that cultural resources should be subject to judicious management.

City of Los Angeles. The City of Los Angeles (City of Los Angeles 2001) in Section 3 of the Conservation Element of the General Plan requires that measures be taken to protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes. One policy and one program support this requirement. This policy requires that the City continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or are identified during land development, demolition, or property modification activities.

City of Malibu. The City of Malibu General Plan Conservation Element (1995) has one goal, one objective, two policies, and multiple implementation measures regarding paleontological resource preservation. Con Goal 2 and Con Objective 2.1 are to preserve and project cultural resources for future generations and scientific study. In support of this, Con Policies 2.1.1 and 2.2.2 require that the City identify, designate, protect, and preserve areas and sites of paleontological significance and that destruction of resources be avoided. Con Implementation Measures 77-79 and 82-84 outline specific actions to implement the policies, including, but not limited to, impact assessments, paleontological surveys, and formulation and implementation of project mitigation measures.

City of Palmdale. The City of Palmdale has one goal, one objective, and two policies regarding paleontological resources in the General Plan's Environmental Resources element (City of Palmdale 1993). Goal ER7 requires that the City protect historical and culturally significant resources which contribute to the community's sense of history. Objective ER7.1 states that the City shall promote the identification and preservation of historic structures, historic sites, archaeological sites, and paleontological resources in the City. In support of this objective, Policy ER7.1.3 requires that new development protect significant historic, paleontological, or archaeological resources or provide for other appropriate mitigation. Additionally, Policy ER7.1.4 states that the City shall develop and maintain a cultural sensitivity map and require special studies/surveys to be prepared for any development proposals in areas reasonably suspected of containing cultural resources, or as indicated on the sensitivity map.

City of Pasadena. The General Plan of the City of Pasadena Land Use Element (City of Pasadena 2004) has one objective and one policy regarding paleontological resources. Objective 19 requires that the City protect and enhance areas of the city containing important biological resources; protect and minimize disturbance of any important paleontological and/or archaeological resources that might remain in the city. Policy 19.3, Paleontological/Archaeological Resources Survey, requires that project proponents proposing substantial grading or earthmoving in areas that might contain important paleontological and/or archaeological resources shall conduct a pre-excavation field assessment and literature search to determine the potential for disturbance of paleontological and/or archaeological resources. If warranted, grading and other earthmoving activities shall be monitored by a qualified professional who,

if necessary, shall undertake salvage and curation. Any paleontological or archaeological resources recovered shall be documented and archived appropriately.

City of San Dimas. The City of San Dimas has one goal, one objective, and one policy regarding paleontological resources in the General Plan Conservation Element (City of San Dimas 1991). Goal CN-2 is to conserve the historical and cultural resources of the City (including paleontological resources). Objective 2.1 is to promote the conservation of resources through programs and policies to both identify and protect resources. Policy 2.1.1 requires preservation of significant paleontological sites and evaluation of significance on a case-by-case basis.

City of Santa Monica. Goal HP 1 and Policy HP 1.10 of the City of Santa Monica General Plan (2010) Land Use and Circulation Element address paleontological resources. Goal HP 1 is to preserve and protect historic resources (including paleontological resources) through the land use decision-making process by reviewing proposed potential impacts on unique paleontological resources from proposed developments and incorporating appropriate mitigation measures to protect or document resources.

City of Whittier. The City of Whittier has one goal and one policy regarding paleontological resources in the General Plan Historic Resources Element (City of Whittier 1993). Goal 1 is to determine the nature and extent of the City's cultural heritage (including paleontological heritage) by requiring evaluation of the potential for archaeological and paleontological resources during the environmental review phase of development projects (Policy 1.2). The General Plan also calls for preservation of cultural resources and states that individual preservation measures shall be established based on the significance, need, and available support.

3.4.3.4 Cultural and Paleontological Resources Planning and Methods

Cultural Resources

Identifying Historical Resources

Identifying historical resources within each proposed Project site included a records search and literature review for significant or unique archaeological, architectural, and Native American resources. These records searches were undertaken at various local and regional archives, including the applicable California Historical Resources Information System (CHRIS) center and the Native American Heritage Commission Sacred Lands Files, and through public outreach efforts to appropriate municipalities for local historical resources listings. Various federal and state databases were also consulted, including the National Register of Historic Places, the CRHR, California Historical Landmarks listings, California Points of Historical Interest listings, and the California Office of Historic Preservation's (OHPs) Historic Properties Directory. The records search encompassed a 0.5-mile radius around the construction footprint at each proposed Project site.

Field surveys were also conducted at each proposed Project site to identify or confirm the status of historical resources. Each field survey was conducted by both a professional archaeologist and

architectural historian and included ground-level photography and data entry on tablet computers. Results of the survey for each proposed Project site are found in Chapter 4.

Areas of Potential Effects

For the proposed Project, each proposed Project site has two areas of potential effects (APEs). The direct APE is defined as the maximum extent of ground disturbance required for facility and utility installation and construction, including the project footprint and any needed equipment staging areas or access corridors. The direct APE also includes a depth of construction up to 36 feet below grade, which is the maximum depth usually required for installation of a monopole. The direct APE coincides with the proposed Project site boundary (footprint of construction activities) but also includes a 50-foot buffer in the event of potential inadvertent disturbance adjacent to the site. Excluded areas include those occupied by existing permanent buildings and structures, and/or where it is known that no ground disturbance would occur during Project activities. The direct APE also includes areas where antenna support structures or other infrastructure has been proposed for attachment directly to a building or structure.

The indirect APE encompasses the viewshed within which visual effects on historical resources may occur from newly constructed features within the direct APE, up to a maximum of 0.5 mile around the direct APE. The 0.5-mile radius is based on guidance provided in the FCC's Nationwide PA for the maximum distance that a 200-foot or less communications tower can be seen. The indirect APE does not apply to paleontological resources. Table 3.4-1 shows the types of cultural resources identified within each of the proposed Project sites. Additional information about each proposed Project site is also found in Chapter 4. The APE for cultural resources is not applicable to paleontological resources.

Assessment of Effects

Impact assessment on cultural resources is based on a correlation of the identified historical resources and the location of project activities within the APE. When ground-disturbing project activities overlap with known historical resources sites, or historical buildings or structures are altered during construction, direct adverse impacts can occur. Indirect adverse effects can occur when project activities or out-of-character elements are introduced nearby or within line-of-sight but are not located directly on identified historical resources. The assessment of effects for this Project was determined through the literature review, a review of aerial images, and the on-the-ground site visits. Under CEQA, the determination of effects on historical resources uses four assessment categories: No Impact; Less than Significant Impact; Less than Significant Impact with Mitigation; and Potentially Significant Impact, which would require the development of mitigation measures.

Paleontological Resources

Identifying Paleontological Resources

Identifying the locations and likelihood of occurrence of surface and subsurface paleontological resources involves a review of published geological maps, a literature search of both published and

unpublished scientific literature, an institutional records search, and consultation with local technical experts. For this Project the institutional records search was conducted at the Natural History Museum of Los Angeles County. The procedures used to analyze existing paleontological data are consistent with best practices in mitigation paleontology (Murphey et al. 2014).

Assessment of Effects

The assessment of project effects on paleontological resources uses the Society of Vertebrate Paleontology's (SVPs) "Standard Procedures for Assessment and Mitigation of Adverse Impacts to Paleontological Resources." This guidance (SVP 2010) recognizes four categories of paleontological potential. These are:

High Potential

Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rock units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations, some volcanic formations, some low-grade metamorphic rocks containing significant paleontological resources anywhere within their geographical extent, and sedimentary rock units that are suitable for the preservation of fossils. Project activities potentially affecting rock units with a high potential to contain significant paleontological resources require paleontological resource impact mitigation.

Moderate/Unknown Potential

Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study, typically through field survey, is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. Once these studies are complete, an assessment of potential project effects is determined; and, if necessary, a paleontological resource impact mitigation program can be developed.

Low Potential

Reports in paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Low potential rock units are usually poorly represented by fossil specimens in institutional collections as well. Rock units with low potential to contain significant paleontological resources typically will not require impact mitigation measures to protect fossils.

No Potential

Some rock units have no potential to contain significant paleontological resources. These include, but are not limited to, high-grade metamorphic rocks and plutonic igneous rocks. Rock units with no potential to contain significant paleontological resources require no protection or impact mitigation measures.

Additional information about paleontological resources within each proposed Project site is found in Chapter 4 and Appendix B-4.

3.4.4 Significance Criteria

3.4.4.1 *CEQA Guidelines*

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of identified impacts on cultural resources. Based on Appendix G of the CEQA Guidelines, a project would have a significant cultural resources impact if it were to:

- 1) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5

Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5

Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Disturb any human remains, including those interred outside formal cemeteries

Cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074

3.4.5 Impact Analysis

3.4.5.1 *Proposed Project*

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Threshold: The Project would result in a substantial adverse change if construction and/or operational activities would result in the physical demolition, destruction, relocation, or alteration of a historical resource, including locally significant resources, or its immediate surroundings such that the significance of the resource would be materially impaired. A historical resource would be materially impaired if the Project:

- 1) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources;

Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC section 5020.1(k) or its identification in a historical resources survey meeting the requirements of PRC section 5024.1(g), unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Impacts on historical resources at all 54 proposed Project sites are described below and shown in Table 3.4-3. Additional information is also provided in Chapter 4 and Appendix B-4.

No Impact on Historical Resources

Construction Impacts

Activities at 26 of the Proposed Project sites would have no impact on historical resources because these sites either have no identified historical resources within the direct or indirect APEs, or the resources are situated at a distance from the Project site such that Project construction activities would not directly (through construction/ground disturbance) or indirectly (visually) affect any identified resources. Therefore, no mitigation measures are required (see Table 3.4-3).

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal. Because no historical resources are within the direct or indirect APEs, or the resources are situated at a distance from the Project site such that Project activities would not directly (through construction/ground disturbance) or indirectly (visually) affect any identified resources, no mitigation measures are required (see Table 3.4-3). Therefore, there would be no impact on historical resources from operational activities.

Less Than Significant Impact on Historical Resources

Activities at the 18 proposed Project sites listed below would have less than significant impacts on historical resources (see Table 3.4-3).

BUR	BUR1	BUR2	BUR3	FRP	GMT	JOP	JPK	JPK2
LACFCP11	MML	MTL2	PMT	SUN	SUN2	TMT	WMP	WTR

Construction Impacts

The 18 proposed Project sites listed above are situated wholly or partially within Resource No. P-19-186535 and/or Resource No. P-19-187829. P-19-186535 is the Los Angeles National Forest/San Gabriel Mountains National Monument. The resource is considered a historical resource under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Resource No. P-19-187829, is eligible for inclusion in the NRHP as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933 and 1952. Included among the contributing landscape elements are the major topographical features found on the forest, because

without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in southern California and is believed to be the most significant within the U.S. Forest system. Given the enormous size of these two overlapping resources, the small footprint associated with each proposed Project site, and the lack of resource-associated historical buildings, structures, or sites within the 18 APEs, impacts on archaeological or Native American resources would be less than significant; and no mitigation measures are required. Because all 18 of these Project sites are situated on federal land, consultation and coordination with the appropriate agencies is in progress.

Operation Impacts

Operations and maintenance at the 18 proposed Project sites listed above would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the enormous size of the two overlapping resources, the small footprint associated with each proposed Project site, and the lack of resource-associated historical buildings, structures, or sites within the 18 APEs, indirect (visual) impacts would be less than significant; and no mitigation measures are required. Because all 18 of these Project sites are situated on federal land, consultation and coordination with the appropriate agencies is in progress.

Significant Impacts on Historical Resources

Two of the 54 Project sites (PASPD01 and WAD) would be adversely impacted by Project activities (see Table 3.4-3), and impacts would be significant. Site PASPD01 and Site WAD are described and analyzed below, and mitigation measures to reduce or avoid significant impacts are provided later in this section.

Construction Impacts

Project activities at Site PASPD01 involve construction of a proposed 70-foot monopole (plus 15-foot lightning rod) and associated infrastructure features. Project activities at Site WAD involve the extension of an existing 120-foot monopole to 140 feet and associated infrastructure features. No archaeological or Native American resources have been identified within these Project locations; therefore, there will be no impacts from ground-disturbing activities at these Project locations.

Operation Impacts

Operations and maintenance at Site PASPD01 would consist of inspections, maintenance, testing, and minor repairs; and ground disturbance would be minimal (e.g., periodic brush clearance as needed). Historical resources (architectural) have been identified within each indirect APE. Because these resources are within direct line-of-sight of the proposed monopole, one or more of the historical resources at each proposed Project site would be adversely affected. Proposed activities at Site WAD involve the extension of an existing 120-foot monopole to 140 feet to accommodate additional antennas. This extension would make the monopole visible to historical resources identified within the indirect APE. Based on the proximity of Project activities to identified historical resources at each of the proposed Project sites within this impact category, impacts would be significant.

Project sites ENC1, PWT, TOP, and ZHQ

Construction Impacts

Archaeological resources have been identified within the vicinity of proposed Project sites ENC1, PWT, TOP, and ZHQ; and impacts could occur during ground-disturbing activities. In accordance with the CEQA Guidelines Section 15120(d), FOIA, NHPA Section 304, and ARPA Section 9, the locations and nature of sensitive resources are protected; therefore, specific details about the archaeological resources identified at these proposed Project sites are not provided within this EIR, however, impacts would be significant.

Operation Impacts

Operations and maintenance at proposed Project sites ENC1, PWT, TOP, and ZHQ would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the nature of the operational activities, impacts on archaeological resources would be less than significant.

Project Site H-69B

Construction Impacts

Proposed Project Site H-69B is situated at an elevation of approximately 2,406 feet above mean sea level (amsl) in an unincorporated area of Los Angeles County. The direct APE is approximately 2.4 acres in size and encompasses mountainous, undeveloped open space. Various portions of the direct APE are forest, patchy low vegetation, and recently graded bare earth; numerous rocky outcrops are present. The southern boundary of the direct APE is crossed by a modern paved road that provides access to large, sparsely scattered residences and undeveloped parcels situated within the indirect APE.

No previously recorded historical resources are within the direct or indirect APEs for this proposed Project site; however, during field surveys, prehistoric archaeological sites and features were newly identified that would meet the criteria for historical resources and an archaeological/ethnographic landscape under the CEQA Guidelines. In accordance with the CEQA Guidelines Section 15120(d), FOIA, NHPA Section 304, and ARPA Section 9, the locations and nature of sensitive resources are protected; therefore, specific details about the archaeological resources identified at this proposed Project site are not provided within this EIR. The condition and status of this proposed Project site were confirmed by a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian during a field survey in January 2015.

Project activities at Site H-69B include attachment of whip antennas and microwave dishes on a proposed 180-foot lattice tower and construction of a new equipment shelter, backup generator, and fuel tank. Construction of a 180-foot lattice tower with a 15-foot lightning rod and the associated antennas and infrastructure features would materially alter surface and subsurface archaeological materials at this proposed Project site and would be visually out of character with the archaeological landscape; therefore, impacts at this proposed Project site would be significant.

Operation Impacts

Operations and maintenance at Project Site H-69B would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the nature of operation activities, impacts on archaeological and Native American resources would be less than significant.

A 180-foot lattice tower with a 15-foot lightning rod would be visually out of character within this Project site; therefore, indirect (visual) impacts would be significant.

Site LACFCP08

Construction Impacts

Site LACFCP08 is a fire camp situated at an elevation of approximately 1,552 feet amsl in an unincorporated, mountainous area of Los Angeles County. The direct APE is approximately 1.7 acres in size and encompasses developed and undeveloped areas of a Cold War-era military facility that extends into the indirect APE. Within the direct APE, features include two buildings, paved surfaces, sparsely vegetated areas with several mature trees, and a dirt and gravel road. The indirect APE encompasses numerous buildings associated with past military and present Camp 8 activities, residential communities, and several paved and unpaved access roads.

No previously recorded historical resources are within the direct or indirect APEs at this proposed Project site; however, during field surveys, previously unrecorded technical (engineering elements) and administrative (buildings and structures) features of a Cold War-era Nike missile complex were identified within both the direct and indirect APEs that would meet the criteria for historical resources under the CEQA Guidelines. The complex, historically known as LA-78 (Malibu), is a Nike launch site and is one of two related elements associated with the Nike missile program at this general location. The second element (the LA-78 Integrated Fire Control [IFC]), is situated approximately 1.3 miles to the northwest. Both elements of the complex were among 16 Nike missile facilities constructed in a ring around the greater Los Angeles area to defend against Soviet long-range bomber aircraft. LA-78 was activated in 1963, and the entire Nike system was deactivated in 1974. Although this complex has not been formally evaluated for inclusion in the NRHP or CRHR the history and integrity of the elements would meet the eligibility criteria for inclusion in both. As a result, the Nike complex at LACFCP08 is treated as an eligible single resource consisting of multiple contiguous, interrelated, technical, and administrative elements. The condition and status of this proposed Project site was confirmed through archival research and during a field survey conducted by a SOI-qualified archaeologist and architectural historian in January 2015.

Proposed Project construction at Site LACFCP08 includes the attachment of whip and microwave antennas on a proposed 70-foot monopole with a 15-foot lightning rod, construction of a new equipment shelter, and installation of a new back-up generator and fuel tank on a concrete pad. Construction at Site LACFCP08 would be direct and indirect (visual) on the existing Cold War-era resources associated with Nike launch site LA-78 (Malibu). The proposed Project site is within the Nike

site footprint, and installation of the monopole and the associated infrastructure features would both directly and visually impact the Nike landscape; therefore, impacts would be significant.

Operation Impacts

Operations and maintenance at Site LACFCP08 would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the nature of operation activities, impacts on archaeological and architectural resources would be less than significant.

A 70-foot monopole with a 15-foot lightning rod would be visually out of character within the Nike missile site landscape; therefore, indirect (visual) impacts would be significant.

Site LACFCP09

Construction Impacts

Site LACFCP09 is a fire camp situated at an elevation of approximately 3,867 feet amsl in an unincorporated mountainous area of Los Angeles County. The direct APE is approximately 0.36 acre in size and encompasses developed and undeveloped areas of a Cold War-era military facility that extends into the indirect APE. The direct APE encompasses paved surfaces, landscaped areas, and mature trees with buildings immediately adjacent on three sides. The indirect APE encompasses primarily undeveloped, mountainous terrain and paved and unpaved access roads, as well as several buildings associated with past military and present Camp 9 activities.

Two historical resources are located within the direct and indirect APEs. The two resources are P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. In addition, USFS Resource No. 05015500237 is within both the direct and indirect APEs at this proposed Project site. This resource consists of three separate loci of the Los Pinetos Nike Missile Site, which was constructed in 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures), the radar control facility, and the launch control facility. The direct APE is completely encompassed by one of the Nike missile loci, and the remaining two are approximately 1,500 feet to the east and west. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the NRHP.

Project activities at this proposed Project site include the attachment of whip and microwave antennas on a proposed 70-foot monopole with a 15-foot lightning rod; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. The construction of these proposed facilities would directly and adversely affect the Los Pinetos Nike Missile Site, which is eligible for inclusion in the NRHP. The Project site is completely encompassed by one of three discontinuous areas associated with the Nike site (center locus), and installation of the monopole and associated

infrastructure features would both directly and visually impact the Nike landscape. The condition and status of cultural resources at this proposed Project site were confirmed through archival research and during a field survey conducted by both a SOI-qualified archaeologist and architectural historian in December 2014.

Given the enormous size and scale of Resource P-19-186535, the small footprint of the proposed Project site, and the lack of any resource-associated features associated with Resource P-19-186535 at this proposed Project site, impacts would be less than significant.

USFS Resource No. 05015500237 is within both the direct and indirect APEs and is a NRHP-eligible property. Based on the proposed Project activities, direct and indirect (visual) impacts from construction of the 70-foot monopole and the associated infrastructure features would be significant.

Operation Impacts

Operations and maintenance at Site LACFCP09 would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the nature of the operational activities, impacts on archaeological and architectural resources would be less than significant.

A 70-foot monopole with a 15-foot lightning rod would be visually out of character within the Nike missile site landscape; therefore, indirect (visual) impacts would be significant.

Site LPC

Construction Impacts

Site LPC is situated at an elevation of approximately 4,025 feet amsl in an unincorporated, mountainous area of Los Angeles County. The direct APE is approximately 0.90 acre in size and encompasses developed and undeveloped portions of a Cold War-era military facility that extends into the indirect APE. The direct APE encompasses paved surfaces, areas of sparse vegetation, and remnants of one of three loci of a former Cold War-era Nike missile site. The indirect APE consists primarily of undeveloped, mountainous terrain. Adjacent to the direct APE is a modern communications site with a lattice tower, and approximately 0.30 mile to the east is a second locus of the same Nike missile site.

Two historical resources are located within the direct and indirect APEs. The two resources are P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. In addition, USFS Resource No. 05015500237 is within both the direct and indirect APEs. This resource consists of two of three separate loci of the Los Pinetos Nike Missile Site, which was constructed in 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures) and the radar control facility; the third locus

(the launch control facility) is situated just outside the southeast boundary of the indirect APE. The direct APE is completely encompassed by one of the Nike missile loci, and the remaining two are approximately 1,650 to 2,900 feet to the east. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the NRHP.

Project activities at this site include the attachment of whip and microwave antennas on a proposed 70-foot monopole with a 15-foot lightning rod; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. Impacts from construction of the monopole and associated infrastructure features at this proposed Project site would directly and indirectly (visually) impact the existing Cold War-era resources associated with the Los Pinetos Nike Missile Site, which is eligible for inclusion in the NRHP. The Project site is completely encompassed by one of three discontinuous areas associated with the Nike site (westernmost locus), and installation of the monopole would both directly and visually impact the Nike landscape. This was confirmed through archival research and during a field survey conducted by both a SOI-qualified archaeologist and architectural historian in December 2014.

Given the enormous size and scale of Resource P-19-186535, the small footprint of the proposed Project site, and the lack of any site-associated uniquely definable features at this proposed Project site, impacts would be less than significant.

USFS Resource No. 05015500237 is within both the direct and indirect APEs and is a NRHP-eligible property. Based on the proposed Project activities, direct and indirect (visual) impacts from construction of the 70-foot monopole and the associated infrastructure features would be significant,

Operation Impacts

Operations and maintenance at Site LPC would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal (e.g., periodic brush clearance as needed). Given the nature of the operational activities, impacts on archaeological and architectural resources would be less than significant.

A 70-foot monopole with a 15-foot lightning rod would be visually out of character within the Nike missile site landscape; therefore, indirect (visual) impacts would be significant.

Cultural Resources Mitigation Measures

Mitigation measures and the proposed Project sites for which they are required are described below and shown in **Error! Reference source not found.** Requirements for mitigation are determined through a combination of historical records reviews, which occurs during early planning, and finalized upon completion of field surveys and the assessment of impacts on identified historical resources. Construction and operational personnel will be notified well in advance of construction for proposed Project sites with cultural resources constraints and required mitigation measures. Additional information about all 54 proposed Project sites is provided in Chapter 4 and Appendix B-4.

CUL MM 1: Archaeological or Native American Monitoring – Prehistoric Resources

At Project sites with known or potential presence of prehistoric archaeological material (artifacts and/or features) within the defined APEs, qualified archaeological or Native American monitors shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined in Section 3.4.3.4.

The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

In the event that prehistoric archaeological material is unexpectedly discovered within the APE, the procedures set forth in CUL MM 3 shall be followed.

CUL MM 2: Archaeological Monitoring – Historic-Age Resources

At proposed Project sites with known or potential presence of historic-age archaeological material (artifacts and/or features) within the defined APEs, a qualified archaeological monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Monitors will also be responsible for restricting access by construction personnel to any identified archaeological resources as noted in this EIR section or Chapter 4. The direct and indirect APEs are defined at the beginning of this EIR section.

The archaeological monitor will, at a minimum, have a B.A. in anthropology or related field or will have successfully completed an archaeological field methods school. The monitor will work under the supervision of an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (Project Archaeologist). The standards are published in CFR 36 Part 61 and found on the National Park Service website at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

CUL MM 3: Unexpected Discovery of Archaeological Materials

In the event that previously unidentified prehistoric or historic-age archaeological resources are uncovered, the following actions shall be taken:

- 1) All ground-disturbing work within 165 feet (50 meters) of the discovery shall be halted. The qualified archaeological monitor will mark the immediate area with highly visible flagging and immediately notify the Project Archaeologist.
- 2) The Project Archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource shall be documented on California State Department of Parks and Recreation cultural resource record forms, and no further effort shall be required.
- 3) If the resource cannot be avoided and may be subject to further impact, the Project Archaeologist shall evaluate the resource and determine whether it is (1) eligible for inclusion in the NRHP and is thus a historic property for the purposes of the NHPA and NEPA; (2) eligible for the CRHR and thus a historical resource for the purposes of CEQA; (3) a “unique” archaeological resource as defined by CEQA; (4) a Tribal resource as defined by AB 52. If the resource is determined not to be significant under any of these four categories, work may commence in the area following collection (as appropriate) and recording, including mapping and photography, of the archaeological materials or features.
- 4) If the resource meets the criteria for any or all of the categories described in CUL MM3, work shall remain halted, and the Project Archaeologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse changes occur. Preservation in place (i.e., avoidance) is the preferred method of ensuring no substantial adverse impacts occur on historic properties/historical resources and shall be required unless other equally effective methods are agreed upon among the Project Archaeologist, the Authority, and any other stakeholders.

If the archaeological material appears to represent a site – defined as three or more artifacts and/or features in an intact deposit – an archaeological test program (Phase II) may be necessary. Associated mitigation measures include, but are not limited to, collection of the archaeological materials, recordation (e.g., DPR Primary Record and Site Forms), and analysis of any significant cultural materials in accordance with a Data Recovery Plan, and curation of artifacts at an approved curation facility. A curation agreement for this Project is already in place with the University of California, Los Angeles, Archaeological Collections Facility at the Fowler Museum. At the completion of the appropriate mitigation measures, a professional-level technical report shall be filed with the appropriate California Historical Resources Information System (CHRIS) Information Center (IC).

- 5) Work at the project location may commence upon completion of the appropriate mitigation treatment(s).

CUL MM 4: Unexpected Discovery of Human Remains

In the event that human remains are unexpectedly encountered, the following procedures shall immediately be followed. This guidance is also provided on the NAHC's website at <http://nahc.ca.gov/resources/discovery-of-native-american-human-remains-what-to-do/>.

- 1) All construction activity shall stop immediately, and the Project Archaeologist shall be notified. The Project Archaeologist will contact the Los Angeles (or applicable) County Coroner. The list of California Coroners can be found on the Native American Heritage Commission's website at <http://nahc.ca.gov/2015/06/implementation-of-ab52-sample-letters-request-for-formal-notification-and-request-for-consultation/>.
- 2) The Coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
- 3) The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- 4) The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- 5) If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
- 6) If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

CUL MM 5: Architectural Resources Protection and Camouflage

Attachment of Equipment to Historic Buildings and Structures

For historic buildings or structures where communications-related equipment will be attached, the following preservation practices shall be employed, as applicable, to ensure that impacts are less than significant:

- 1) When running new exterior wiring to a historic building, existing entry points shall be utilized. If a new entry point is required, the entry shall be placed at the rear of the building or in an area on the side of the building where it will be hidden by an existing architectural feature.
- 2) When wireless nodes, antennas, microwave or satellite dishes, etc. are installed on historic buildings, existing mounting points shall be utilized. For new mounts, nonpenetrating mounts shall be used.
- 3) Equipment shall be placed where it does not detract from the building's overall appearance; roof-mounted equipment shall be placed where it will not be visible from accessible locations at grade. Adequate structural support for the new equipment and design shall be ensured, and a system that minimizes the number of cutouts or holes in structural members and historic material shall be installed. Existing building features shall be used to conceal equipment.
- 4) New equipment installations on a historic building that will be visible shall be painted or color-matched to the surrounding building materials. Concealment with color-matched FRP (fiberglass reinforced plastic) shrouds (boxes) is acceptable.
- 5) Any supports or brackets for new equipment shall be color-matched to the existing materials.
- 6) The installation of exterior wiring shall be minimized; where unavoidable, the wiring will be color-matched to the original building material to reduce the visual impact.
- 7) Equipment shall not be directly anchored into stone or brick; mortar joints for anchoring the equipment will be utilized.
- 8) Rust-resistant mounts to prevent staining of the building materials shall be used.
- 9) Reversible mounting techniques shall be used to avoid damage to building materials.
- 10) Installation of underground cable or conduit at a historical resource shall be undertaken in a manner that considers the stability of the historic building, including limiting any new excavations adjacent to historic foundations that could undermine the structural stability of the building and avoiding landscape or other changes that could alter drainage patterns and cause water-related damage to the building.

- 11) New interior wiring shall utilize space in existing chases, closets, or shafts.
- 12) Equipment and systems shall be installed to cause the least alteration possible to the building's floor plan and the least damage to the historic building material.
- 13) Vertical runs of conduit and cables shall be placed in closets, service rooms, and wall cavities to create the least intrusion into the historic fabric of the building and to avoid major intervention into the wall and floor systems.

Architectural Camouflage

All new towers and monopoles or a proposed increase in the height of existing towers and monopoles that would cause adverse visual impacts on historical resources that are adjacent or within the viewshed shall be camouflaged. All camouflage implemented for the proposed Project shall be sympathetic to the existing landscape (<http://www.generalcode.com/codification/sample-legislation/cell-towers>) and/or in accordance with applicable municipal codes (http://clkrep.lacity.org/onlinedocs/2009/09-2645_RPT_ATT_Y_06-07-11.pdf). Tower disguises may include, but are not limited to, painting and various types of concealments, including clock/water towers, flag/light poles, silos, trees, and unique site-specific designs. Such measures must be consistent with the Secretary of the Interior's Standards/Guidelines for the Treatment of Historic Properties (see Attachment of Equipment discussion above).

Impacts after Mitigation

Based on historical research and verified through pedestrian surveys conducted between late 2014 and early 2015, no historical resources would be impacted by Project activities at 26 of the 54 proposed Project sites. Project activities at 18 proposed Project sites would have less than significant impacts on historical resources, and 6 proposed Project sites would have adverse effects that can be mitigated to less than significant levels. The remaining four proposed Project sites would have significant unavoidable impacts for which no feasible mitigation would reduce impacts to less than significant levels. The various proposed Project sites associated with these determinations are listed in Table 3.4-3.

Table 3.4-3. Proposed Project Sites by Impact Level – Archaeological and Architectural Resources

Impact Level	No Historical Resources impacted	Less Than Significant Impacts	Adverse Impacts Mitigated to Less than Significant Levels	Significant and Unavoidable Impacts
Sites	AGH**, AJT, ASD, BJM, CPK, DPK, ENT**, FTP, GRM, H-17A, LACF072, LARICSHQ, LEPS**, MMC, OAT, PDC, PHN, RIH, SDW, SGH, SIM, SPN, TPK, TWR, VPK, WS1	BUR*, BUR1*, BUR2*, BUR3*, FRP*, GMT*, JOP*, JPK*, JPK2*, LACFCP11*, MML*, MTL2*, PMT*, SUN*, SUN2*, TMT*, WMP*, WTR*	PASPD01, PWT*, WAD, ENC1, TOP, ZHQ	H-69B, LACFCP08*, LACFCP09*, LPC*

* Proposed Project sites on federal lands require consultation and coordination with the appropriate federal agency.
 ** Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Mitigation Measures Required to Reduce Impacts to Less than Significant Levels

Mitigation measures required to reduce adverse impacts to less than significant levels are shown by Project site in **Error! Reference source not found.** and described in the following sections.

Sites PASPD01, and WAD

Construction of a monopole at Site PASPD01 and the extension of the existing monopole at the Site WAD would cause adverse visual impacts on one or more identified historical resources within the indirect APE at each site; however, by disguising or camouflaging the monopole using paint or architectural screening, visual effects would be minimized and impacts would be reduced to less than significant levels (CUL MM 5).

Sites ENC1, PWT, TOP, and ZHQ

Construction of proposed monopoles would cause adverse impacts on archaeological resources located within the vicinity of the ENC1, PWT, TOP, and ZHQ Project sites. To ensure that subsurface prehistoric archaeological resources are not disturbed, an archaeologist or Native American monitor will be present during all ground-disturbing activities. Through implementation of CUL-MM 1, CUL MM 3, and CUL MM 4, impacts on archaeological resources would be reduced to less than significant levels.

Table 3.4-4. Mitigation Measures Required to Reduce Adverse Impacts to Less than Significant Levels by Project Site

Mitigation Measure	CUL MM 1 Prehistoric Archaeological Resources - Archaeological or Native American Monitoring**	CUL MM 2 Historic-Age Archaeological Resources - Archaeological Monitoring	CUL MM 3 Unexpected Discovery of Archaeological Materials	CUL MM 4 Unexpected Discovery of Human Remains	CUL MM 5 Architectural Resources Protection and/or Camouflage
AGH***	X	N/A	X	X	N/A
ENC1	X	N/A	X	X	N/A
ENT***	X	N/A	X	X	N/A
LEPS***	X	N/A	X	X	N/A
PASPD01	N/A	N/A	X	N/A	X
PWT*	X	N/A	X	X	N/A
TOP	X	N/A	X	X	N/A
WAD	N/A	N/A	N/A	N/A	X
ZHQ	X	N/A	X	X	N/A
* Proposed Project sites on federal lands require consultation and coordination with the appropriate federal agency. ** May also require restricted access to identified archaeological resources by construction and operational personnel. *** Based on records searches and field surveys, there are no archaeological sites within the direct APE of this project site and there would be no impacts; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.					

Site H-69B

Archaeological monitors would be required during all ground-disturbing activities at Site H-69B. Because of the proximity of archaeological resources to the Project construction area, access to archaeological areas would also be restricted to all construction and operational personnel. With implementation of CUL MM 1, CUL MM 3, and CUL MM 4, impacts would be minimized; however, given the magnitude of the ground disturbance and the location and extent of the resources present at this site, mitigation measures would not reduce impacts to less than significant levels.

Standard approaches to mitigation for towers (painting/camouflage) (i.e., CUL MM 5), particularly for towers of this height, would not be effective and would not reduce the visual impacts to less than significant levels. In addition, the painting of tall telecommunications towers is controlled by FAA Advisory Circulars 47 CFR § 17.21-17.58 to prevent aviation hazards; therefore, painting would not be a feasible mitigation at this Project site.

Even with implementation of the required mitigation measures referenced and discussed above and shown in Table 3.4-5, impacts would not be reduced to less than significant levels. Therefore, impacts at Site H-69B would be significant and unavoidable.

Site LACFCP08

Archaeological monitors would be required during all ground-disturbing activities at Site LACFCP08. In addition, the proposed monopole would be out of character with the Cold War-era Nike landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MM 2, CUL MM 3, and CUL MM 5, impacts on historical resources would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this site, even with implementation of the required mitigation measures referenced and discussed above and shown in Table 3.4-5, impacts would not be reduced to less than significant levels. Therefore, impacts at this Project site would be significant and unavoidable.

Because this site is situated on National Park Service (NPS) land, consultation with this agency is in progress.

Site LACFCP09

Archaeological monitors would be required during all ground-disturbing activities at Site LACFCP09. In addition, the proposed monopole would be out of character with the Cold War-era Los Pinetos Nike Missile Site landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MM 2, CUL MM 3, and CUL MM 5, impacts on historical resources would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this site, even with implementation of the required mitigation measures referenced and discussed above and shown in Table 3.4-5, impacts would not be reduced to less than significant levels. Therefore, impacts at Site LACFCP09 would be significant and unavoidable.

Because this site is situated on USFS land, consultation with this agency is in progress.

Site LPC

Archaeological monitors would be required during all ground-disturbing activities at Site LPC. In addition, the proposed monopole would be out of character with the Cold War-era Los Pinetos Nike Missile Site landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MM 2, CUL MM 3, and CUL MM 5, impacts would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this site, even with implementation of the required mitigation measures referenced and discussed above and shown in Table 3.4-5, impacts would not be reduced to less than significant levels. Therefore, impacts at Site LPC would be significant and unavoidable.

Because this site is situated on USFS land, consultation with this agency is in progress.

Table 3.4-5: Mitigation Measures Identified for Proposed Project Sites

Mitigation Measure	CUL MM 1 Prehistoric Archaeological Resources - Archaeological or Native American Monitoring**	CUL MM 2 Historic-Age Archaeological Resources - Archaeological Monitoring	CUL MM 3 Unexpected Discovery of Archaeological Materials	CUL MM 4 Unexpected Discovery of Human Remains	CUL MM 5 Architectural Resources Protection and/or Camouflage
Mitigation Measures Identified for Proposed Project Sites with Significant and Unavoidable Impacts					
H-69B	X	N/A	X	X	+
LACFCP08*	N/A	X	X	N/A	X
LACFCP09*	N/A	X	X	N/A	X
LPC*	N/A	X	X	N/A	X
* Proposed Project sites on federal lands require consultation and coordination with the appropriate federal agency. ** May also require restricted access to identified archaeological resources by construction and operational personnel. + Infeasible mitigation based on FAA Advisory Circulars 47 CFR § 17.21-17.58					

Impacts after Mitigation

Given the magnitude of the ground disturbance and the extent of the resources present at Project sites H-69B, LACFCP08, LACFCP09, and LPC, even with implementation of the required mitigation measures referenced and discussed above, impacts would not be reduced to less than significant levels. Therefore, impacts at these four Project sites would be significant and unavoidable.

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal; therefore, impacts on historical resources during routine operation at the proposed Project sites would be less than significant.

As described above, construction of either a 70-foot monopole or 180-foot lattice tower at Project sites H-69B, LACFCP08, LACFCP09, and LPC would be a significant visual impact on identified historical resources and historic districts. Mitigation Measures

Mitigation measures as described above (i.e., camouflage for the 70-foot monopoles) would minimize the visual effects but would not reduce the impacts to less than significant levels on the identified historical resources and historic districts. There is no feasible mitigation to avoid the impacts of locating a 180-foot lattice tower at Site H-69B; therefore, even with implementation of the required mitigation measures, impacts would be significant and unavoidable.

Impacts after Mitigation

Given the magnitude of the ground disturbance and the extent of the resources present at Project sites H-69B, LACFCP08, LACFCP09, and LPC, implementation of the required mitigation measures referenced and discussed above would not reduce impacts to less than significant levels. Therefore, impacts at these four Project sites would be significant and unavoidable.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Construction Impacts

Construction impacts on archaeological resources would be the same as those described for the subset of eight proposed Project sites encompassing the prehistoric and historic archaeological sites discussed under CUL-1 (ENC1, H-69B, LACFCP08, LACFCP09, LPC, PWT, TOP, and ZHQ) (see Table 3.4-4 and Table 3.4-5). Based on the location and type of project activities and the extent of resources at these proposed Project sites, construction impacts would be significant. Additional information about these eight sites is provided in the discussion of CUL-1, Chapter 4, and Appendix B-4.

Mitigation Measures

Because prehistoric archaeological materials have been identified within the vicinity of Project sites ENC1, H-69B, PWT, TOP, and ZHQ, archaeological monitoring will be required (CUL MM 1, CUL MM 3, and CUL MM 4) at these five Project sites (see CUL 1, Chapter 4, and Appendix B-4).

Given the potential for historic archaeological resources at Project sites LACFCP08, LACFCP09, and LPC, archaeological monitoring during all ground-disturbing activities (CUL MM 2 and CUL MM 3) would be implemented at these three project sites (see CUL 1, Chapter 4, and Appendix B-4).

Impacts after Mitigation

At sites ENC1, PWT, TOP, and ZHQ impacts on prehistoric archaeological resources would be significant; however, with implementation of mitigation measures CUL MM 1, CUL MM 3, and CUL MM 4, impacts would be reduced to less than significant (see CUL 1, Chapter 4, and Appendix B-4).

At Site H-69B, impacts on prehistoric archeological resources would be significant. Based on the nature of this site, the location of Project activities, and the extent and location of the resources CUL MM 1, CUL MM 3, and CUL MM 4 would be implemented to minimize impacts; however, the impacts would remain significant and unavoidable (see CUL 1, Chapter 4, and Appendix B-4).

At sites LACFCP08, LACFCP09, and LPC, impacts on historic archeological resources would be significant. Based on the historical significance of these project sites and the extent and location of the resources CUL MM 2 and CUL MM 3 would be implemented to minimize impacts; however, the impacts would remain significant and unavoidable (see CUL 1, Chapter 4, and Appendix B-4).

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance would be minimal; therefore, impacts on archaeological resources during routine operation at the proposed Project sites would be less than significant.

Mitigation Measures

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Construction Impacts

Project activities would have a significant impact on paleontological resources at 24 of the proposed Project sites. No impacts are expected at the remaining 30 proposed Project sites (see Table 3.4-6). Additional details about these proposed Project sites are provided in Chapter 4 and Appendix B-4.

Mitigation Measures

CUL MM 6: Paleontological Resources Monitoring Plan

A Paleontological Resources Monitoring Plan shall be developed and approved prior to construction to guide the activities of monitors during ground-disturbing activities. The plan would include, but not be limited to, a description of the project location, the regulatory framework, site-specific impact mitigation requirements designed to reduce impacts to less than significant, specific locations and construction activities requiring monitoring and/or spot checking, and procedures to follow for construction monitoring and fossil discovery and recovery, and a repository agreement with the Natural History Museum of Los Angeles County or other accredited repository. Mitigation measures that may be implemented to ensure that impacts to paleontological resources would be reduced to less than significant may include but are not limited to the following:

- a) Worker awareness training on paleontological resources presented to construction personnel prior to the start of construction. The training should include at minimum, the following:
 - The types of fossils that could occur at the project site
 - The procedures that should be taken in the event of a fossil discovery
 - Laws protecting paleontological resources
 - Penalties for destroying or removing paleontological resource

- b) Paleontological monitoring during ground disturbance at all sites with moderate/unknown or high paleontological potential
- c) Salvage of significant fossil resources
- d) Screenwashing of matrix samples for microfossils
- e) Laboratory preparation of recovered fossils to the point of identification and curation
- f) Identification of recovered fossils to the lowest possible taxonomic order
- g) Curation of significant fossils at the Natural History Museum of Los Angeles County or other accredited repository
- h) Preparation of a final monitoring report that includes at a minimum the dates of field work, results of monitoring, fossil analyses, significance evaluation, conclusions, locality forms, and an itemized list of specimens.

The Plan shall be submitted to the Authority for review and approval and finalized at least 14 days prior to the start of construction.

CUL MM 7: Paleontological Resources Monitoring

Paleontological monitoring shall be conducted by a qualified paleontological monitor who has demonstrated experience in the collection and salvage of fossil materials. An undergraduate degree in geology or paleontology is preferable but is less important than documented experience performing paleontological monitoring and mitigation. The monitor will work under the supervision of a Principal Paleontologist.

The qualified professional paleontological monitor shall be present during ground disturbance at all sites with moderate/unknown or high paleontological potential, and as specified in the Paleontological Resources Monitoring Plan prepared in accordance with CUL MM 6. The monitor shall be present during all subsurface excavation for tower or monopole foundations and during grading for access roads and structure foundations. Any sites that require monitoring or mitigation within the Angeles National Forest will require a qualified paleontologist to have a U.S. Department of Agriculture Forest Service-Temporary Special-Use Permit for paleontology. Based on the specific site conditions observed during monitoring (type of sediment impacted, previous disturbances, nature of site conditions), the Principal Paleontologist may reduce or increase monitoring efforts in consultation with the Agency.

In the event that a previously unidentified paleontological resource is uncovered, the following actions shall be taken:

- 1) All ground-disturbing work within 50 feet of the discovery shall be halted. A qualified paleontologist shall divert or direct construction activities in the area of an exposed fossil in order to facilitate evaluation and, if necessary, salvage of the exposed fossil. Work shall not resume in the discovery area until authorized by the qualified paleontologist.
- 2) The paleontologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, no further effort shall be required.
- 3) If the resource cannot be avoided and may be subject to further impact, the paleontologist shall evaluate the resource and determine whether it is “unique” under CEQA, Appendix G, Part V. If the resource is determined not to be unique, work may commence in the area.
- 4) If the resource is determined to be a unique paleontological resource, work shall remain halted, and the paleontologist shall consult with LA-RICS Authority staff regarding methods to ensure that no substantial adverse change would occur to the significance of the resource. Preservation in place (i.e., avoidance) is the preferred method of ensuring that no substantial adverse impacts occur to the resource and shall be required unless other equally effective methods are available. Other methods include ensuring that the fossils are scientifically recovered, prepared, identified, catalogued, and analyzed according to current professional standards.
- 5) Due to the small nature of some fossils, a fine mesh screen may be used at the discretion of the paleontologist to screen matrix test samples on-site during monitoring. Additionally, bulk matrix samples may be collected and transported to a laboratory facility for processing.
- 6) Provisions for preparation and identification of any fossils collected shall be made before donation to a suitable repository.
- 7) All recovered fossils shall be curated at the Natural History Museum of Los Angeles County, or a local accredited and permanent scientific institution according to Society of Vertebrate Paleontology standard guidelines standards. Work may commence upon completion of the appropriate treatment and the approval from the Authority.

Table 3.4-6. Proposed Project Sites by Impact Level – Paleontological Resources

Impact Level	No Impacts	Less Than Significant Impacts with Mitigation
Site IDs	BJM, BUR, BUR1, BUR2, BUR3, DPK, ENC1, FRP, FTP, GMT, JOP, JPK, JPK2, LACF072, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, PMT, SUN, SUN2, TMT, TPK, TWR, VPK, WAD, WMP, WTR	AGH, AJT, ASD, CPK, ENT, GRM, H-17A, H-69B, LACFCP08, LARICSHQ, LEPS, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, SPN, TOP, WS1, ZHQ

Impacts after Mitigation

With implementation of CUL MM 6 and CUL MM 7, impacts on paleontological resources would be less than significant. Implementation of CUL MM 6 and CUL MM7 would ensure that any paleontological resources identified during ground-disturbing activities are appropriately identified, characterized, and, as applicable, mitigated to reduce impacts to less than significant levels.

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance from minor repairs or brush clearance would be minimal; therefore, impacts on paleontological resources during routine operation at the proposed Project sites would be less than significant.

Mitigation Measures

No mitigation measures are required.

CUL-4: Would the project disturb any human remains, including those interred outside formal cemeteries?

Construction Impacts

Proposed Project sites having the potential for human remains include ENC1, H-69B, PWT, TOP, and ZHQ (see Table 3.4-4 and Table 3.4-5). Based on the location and type of project activities and the extent of resources at these proposed Project sites, construction impacts would be significant. Additional details about these sites are provided in the discussions of CUL-1 and CUL-2, Chapter 4, and Appendix B-4.

Mitigation Measures

CUL MM 1, CUL MM 3, and CUL MM 4 are proposed for all five Project sites with the potential for human remains (ENC1, H-69B, PWT, TOP, and ZHQ). Additional details about these proposed sites are provided in the discussions of CUL-1 and CUL-2, Chapter 4, and Appendix B-4.

Impacts after Mitigation

With implementation of CUL MM 1, CUL MM 3, and CUL MM 4, impacts at proposed Project sites ENC1, PWT, TOP, and ZHQ would be less than significant. Implementation of the mitigation measures would ensure that any human remains identified during ground-disturbing activities are appropriately identified, characterized, reported to the appropriate authorities, and, as applicable, mitigated to reduce impacts to less than significant levels.

Impacts at proposed Project Site H-69B would remain significant, even with implementation of CUL MM 1, CUL MM 3, and CUL MM 4, given the type of project activities and the extent of archaeological resources at this Project site. Therefore, impacts at Site H-69B would be significant and unavoidable.

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance from minor repairs or brush clearance would be minimal; therefore, impacts on human remains during routine operation at the proposed Project sites would be less than significant.

Mitigation Measures

No mitigation measures are required.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074?

Construction Impacts

Proposed Project sites having the potential for Tribal resources include ENC1, H-69B, PWT, TOP, and ZHQ (see Table 3.4-4 and Table 3.4-5). Based on the location and type of Project activities and the extent of resources at these proposed Project sites, construction impacts would be significant. Additional details about these sites are provided in Chapter 4 and Appendix B-4.

Mitigation Measures

CUL MM 1, CUL MM 3, and CUL MM 4 are proposed for all five Project sites with the potential for Tribal resources (ENC1, H-69B, PWT, TOP, and ZHQ). Additional details about these proposed sites are provided in discussions of CUL-1 and CUL-2, Chapter 4, and Appendix B-4.

Impacts after Mitigation

With implementation of CUL MM 1, CUL MM 3, and CUL MM 4, impacts at proposed Project sites ENC1, PWT, TOP, and ZHQ would be less than significant. Implementation of the mitigation measures would ensure that any Tribal resources identified during ground-disturbing activities are appropriately identified, characterized, and, as applicable, mitigated to reduce impacts to less than significant levels.

Impacts at Site H-69B would remain significant, even with implementation of CUL MM 1, CUL MM 3, and CUL MM 4, given the type of Project activities and the extent of archaeological resources at this site. Impacts would be significant and unavoidable.

Operation Impacts

As described in Section 2.1.4, operations and maintenance at the proposed Project sites would consist of inspections, maintenance, testing, and minor repairs. Ground disturbance from minor repairs or brush clearance would be minimal; therefore, impacts on Tribal resources during routine operation at the proposed Project sites would be less than significant.

Mitigation Measures

No mitigation measures are required.

3.4.5.2 No Project Alternative

Under the No Project Alternative, the proposed Project sites would not be developed as communications sites. As a result, no historical resources would be affected by implementation of this alternative.

3.4.6 Cumulative Impact Analysis of the Proposed Project

3.4.6.1 Geographic Extent

Cultural Resources

The geographic area for the analysis of cumulative impacts on cultural resources (i.e., historical resources as defined in CEQA Guidelines Section 15064.5(a) and Section 3.4.3.2 of this EIR) encompasses 18 project locations situated across a large area of Los Angeles County. The 18 Project sites are a subset of the sites shown in Table 2.7-1 and include AGH, ENT, LARICSHQ, LEPS, MML, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, SUN, SUN2, WS1, and ZHQ.

Cumulative analysis for historical resources was performed on a site-by-site basis and considered the impacts of past, present, and reasonably foreseeable projects undertaken within a 0.5-mile radius of each of the 18 Project sites. There are no other proposed projects identified within 0.5-mile of the remaining Project sites listed in Table 2.7-1 with the potential for related impacts to cultural resources. With the exception of SUN and SUN2, none of the Project sites overlap and only one of those two sites would be constructed. The remaining Project sites are separated from the overlapping SUN and SUN2 and from one another by between 2 and 18 miles, with several Project sites also separated by foothill ridges and mountain ranges.

Direct impacts from construction activities were assessed within each of the Project site's ground-disturbing boundary (i.e., direct APE), which included a 50-foot buffer on all sides and any other areas that would be disturbed (e.g., trenching to tie in to an existing electrical power source). Indirect (visual) impacts were assessed on resources located anywhere within a maximum of 0.5-mile from the proposed

newly constructed elements (e.g., towers, equipment shelters, fuel tanks). The 0.5-mile radius is based on guidance provided in the FCC's Nationwide PA for the maximum distance that a 200-foot or less communications tower can be seen.

Paleontological Resources

The geographic area for the analysis of cumulative impacts on paleontological resources encompasses the same 18 Project sites described above for cultural resources and, based on the distances between the sites, uses the same site-by-site approach. For paleontological resources, there is no statutory requirement for a radius within which to analyze impacts; rather, the radius is project dependent and based on the proposed ground disturbance area plus a buffer. For the LMR Project, a 0.5-mile radius was used to coincide with the identified ground disturbance area for cultural resources and used for the records searches at the Natural History Museum of Los Angeles County (LACM) to identify any fossils within each Project site and nearby geologic units.

3.4.6.2 Existing Cumulative Conditions

Cultural Resources

The 0.5-mile radius for each of the 18 Project sites encompasses a unique cumulative environment based on the range of existing conditions noted below and the specific set of other past, present, and reasonably foreseeable future projects identified in Table 2.7-1:

- dense urbanized built environments in flat or rolling terrain consisting of buildings, structures, parking lots, paved streets, freeways, and other hardened surfaces (LARICSHQ, PASPD01, PDC, SGH, SIM)
- heavily disturbed existing communications sites in hilly or mountainous areas surrounded by undeveloped open space having few or no buildings or structures (MML, OAT, PHN, RIH, SUN, SUN2)
- mixed environments that encompass developed areas (typically residential, commercial, or industrial pockets) surrounded by recreation areas (golf courses, beaches, parks), undeveloped land, or designated open space (AGH, ENT, LEPS, PWT, SDW, WS1, ZHQ).

Paleontological Resources

Existing paleontological resources cumulative conditions are the same as described above for cultural resources.

3.4.6.3 Cumulative Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Historical Resources (Archaeological and/or Native American)

Five of the 18 proposed Project sites shown in Table 2.7-1 (LARICSHQ, PDC, SGH, SIM, and WS1) involve the collocation of new or additional antennas on existing buildings or towers. Ground disturbance would be required at some of these Project sites; however, records searches and field surveys indicate that no historical resources (archaeological or Native American) are within ground-disturbing areas at any of these proposed locations; therefore there will be no cumulative impacts on these types of resources at Project sites LARICSHQ, PDC, SGH, SIM, or WS1.

New monopoles would be constructed at six of the 18 proposed Project sites shown in Table 2.7-1 (AGH, ENT, LEPS, PASPD01, PWT, and ZHQ). Records searches and field surveys indicate that no historical resources (archaeological or Native American) are within ground-disturbing areas at any of the six proposed monopole locations; however, these types of resources have been identified within the 0.5-mile radius of PWT and ZHQ, and those two Project sites may be sensitive for them. Based on the nature and location of the other past, present, and reasonably foreseeable future projects listed in Table 2.7-1, in combination with the impacts at Project sites PWT and ZHQ, respectively, cumulative effects would be significant and the contribution of PWT and ZHQ would be cumulatively considerable.

With implementation of archaeological monitoring (CUL MM 1, CUL MM 3, and CUL MM 4) to ensure that any unexpectedly encountered resources are protected, the incremental contribution of Project sites PWT and ZHQ would be reduced to less than significant levels.

Seven of the 18 proposed Project sites shown in Table 2.7-1 (MML, OAT, PHN, RIH, SDW, SUN, and SUN2) involve the construction of a 180-foot lattice tower. At three of the seven Project sites (MML, SUN, and SUN2), historical resources (archaeological) have been identified within the 0.5-mile radius of Project activities; however, as shown in Table 2.7-1, Project site MML is an alternate site for Project site MAM; and only one tower would be constructed. No other projects are proposed within 0.5 mile of this Project site; therefore, there would be no cumulative impacts associated with Site MML.

At the overlapping Project sites of SUN and SUN2, where only one LMR lattice tower will be built, only one other project is proposed. The project involves the construction of a new tower (FCC Application A0906786), which will be a one-for-one replacement for an existing lattice tower that will be dismantled. While historical resources (archaeological) are identified within the SUN and SUN2 Project site, the proposed FCC tower replacement project will be located approximately 1,100 feet southeast of the proposed Project site and within a landscape of approximately 12 communications sites situated along several forest roads, each with existing lattice towers. Because no other projects are proposed at this Project location beyond the one-for-one tower replacement and given the numerous existing lattice towers within the viewshed, there would be no cumulative impacts associated with Project sites SUN and SUN2.

Although Table 2.7-1 lists other past, present, and reasonably foreseeable future projects within a 0.5-mile radius of the remaining four proposed lattice tower Project sites (OAT, PHN, RIH, and SDW), records searches and field surveys indicate that no historical resources (archaeological or Native American) are within each 0.5-mile radius; therefore, there would be no cumulative impacts associated with Project sites OAT, PHN, RIH, and SDW.

Historical Resources (Architectural)

For the five collocated Project sites (LARICSHQ, PDC, SGH, SIM, and WS1), no historical resources (architectural) are within the direct APE; and none are within the indirect APE at Project site LARICSHQ. Based on age and historical research, the antenna support structures themselves are also not historical resources. Historical resources (architectural) have been identified within the 0.5-mile indirect APE of Project sites PDC, SGH, SIM, and WS1. Given the presence of existing communications equipment and/or the location of the new equipment atop non-historic tall buildings where the additional proposed equipment would not be visible at ground level, no out-of-character visual elements would be introduced; and no indirect (visual) effects would occur on the identified architectural resources. As a result, there would be no cumulative effects on historical resources (architectural) associated with Project sites LARICSHQ, PDC, SGH, SIM, and WS1.

No historical resources (architectural) have been identified within the 0.5-mile radius of five of the six proposed new monopole Project sites (AGH, ENT, LEPS, PWT, and ZHQ); therefore, there would be no cumulative impacts on historical resources (architectural) from Project activities at these five Project sites.

At one Project site, PASPD01, numerous individual historical resources (architectural) and historic districts have been identified within the 0.5-mile radius of the proposed Project site. The Project site itself is situated within the Pasadena Civic Center Historic District. As shown in Table 2.7-1, 13 other past, present, or reasonably foreseeable future projects have been identified with the 0.5-mile radius of proposed Project site PASPD01. Among these projects are minor activities (painting, new signage, boundary adjustment); building demolitions; one project that involves collocation of additional camouflaged antennas for the LTE project on an existing communications site located on a parking structure rooftop; and four major rehabilitation or construction projects that would be in character with the existing viewshed. Given the location of the Project site within the historic district, the construction of a 70-foot monopole, in combination with past, present and reasonably foreseeable future projects, would result in a significant cumulative impact and the project's contribution would be cumulatively considerable.

With implementation of architectural screening/camouflage (CUL MM 5) to minimize the visual impacts of the monopole within the historic district, the project's incremental contribution to cumulative impacts would be reduced to less than significant.

As noted above, 7 of the 18 proposed Project sites shown in Table 2.7-1 (MML, OAT, PHN, RIH, SDW, SUN, and SUN2) involve the construction of 180-foot lattice towers. At Project sites MML, SUN, and

SUN2, historical resources (architectural) have been identified within the 0.5-mile radius of Project activities. Site MML is an alternate site for Site MAM, and only one tower would be constructed. No other projects are proposed within 0.5-mile of this Project site; therefore, there would be no cumulative impacts on historical resources (architectural) associated with Site MML.

Overlapping Project sites SUN and SUN2 are situated within the boundary of the San Dimas Experimental Forest Historic District. None of the architectural features associated with this historical resource are within the SUN/SUN2 boundary; and the only other buildings and structures located within the entire 0.5-mile radius are communications-related facilities that include approximately 12 lattice towers situated along an unpaved access road, none of which are historical resources. Given the lack of historical resources (architectural) within the 0.5-mile radius of the SUN and SUN2 Project sites, there would be no cumulative impacts on historical resources (architectural) from Project activities when combined with the past, present, and reasonably foreseeable future projects listed in Table 2.7-1.

Although Table 2.7-1 lists other past, present, and reasonably foreseeable future projects within a 0.5-mile radius of the remaining four proposed lattice tower Project sites (OAT, PHN, RIH, and SDW), records searches and field surveys indicate that there are no historical resources (architectural) within each 0.5-mile radius; therefore, there would be no cumulative impacts on architectural resources at Project sites OAT, PHN, RIH, and SDW.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

Cumulative impacts on archaeological resources are the same as described in CUL-1, Historical Resources (Archaeological and/or Native American).

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Of the 18 proposed Project sites, Project activities at three sites (MML, SUN, and SUN2) would have no impacts on paleontological resources or unique geologic features because they are located within geologic units that have no paleontological potential (gabbro, gneiss, and granitics) and therefore there would be no significant cumulative impact to paleontological resources or unique geologic resources associated with these sites. The remaining 15 sites (AGH, ENT, LARICSHQ, LEPS, OAT, PASPD01, PDC, PHN, PWT, RIH, SDW, SGH, SIM, WS1, and ZHQ) are within geologic units with moderate to high paleontological potential, either at the surface or at depth. Each site, considered in combination with the specified projects listed in Table 2.7-1, would result in significant cumulative impacts and, given the location of each site within geologic units of moderate to high paleontological potential, the incremental contribution from each identified site would be cumulatively considerable.

Mitigation measures CUL MM 6 and CUL MM 7 (paleontological monitoring) would be implemented at each Project site to ensure the protection of any unexpectedly encountered paleontological resources.

With implementation of these measures, the incremental contribution of each site would be less than significant.

CUL-4: Would the project disturb any human remains, including those interred outside formal cemeteries.

Of the 18 proposed Project sites, 16 sites (AGH, ENT, LARICSHQ, LEPS, MML, OAT, PASPD01, PDC, PHN, RIH, SDW, SGH, SIM, SUN, SUN2, and WS1) have no potential to encounter human remains. Human remains have not been identified within a 0.5-mile radius of these Project sites; and, based on records searches and field surveys, these Project sites are not sensitive for them. As a result, there would be no cumulative impacts on human remains at these 16 Project sites.

At Project sites PWT and ZHQ, human remains have not been identified with the direct APE (project ground-disturbing areas); however, human remains have been noted within the 0.5-mile radius of these two Project sites. At Site PWT the other proposed projects are located between 0.15 mile and 0.47 mile from the Project site. At Site ZHQ, the other proposed projects are located between 0.16 miles and 0.44 miles from the Project site. Cumulative impacts would be significant and the contribution of sites PWT and ZHQ would be cumulatively considerable.

Mitigation measures CUL MM 1, CUL MM 3, and CUL MM 4 will be implemented at Project sites PWT and ZHQ to ensure that any unexpectedly encountered human remains are protected and to reduce impacts to less than significant levels.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074.

Of the 18 LMR Project sites, 16 Project sites (AGH, ENT, LARICSHQ, LEPS, MML, OAT, PASPD01, PDC, PHN, RIH, SDW, SGH, SIM, SUN, SUN2, and WS1) have no potential to encounter Tribal cultural resources. Tribal cultural resources have not been identified within a 0.5-mile radius of these Project sites; and, based on records searches and field surveys, these sites are not sensitive for them. As a result, there would be no cumulative impacts on Tribal cultural resources at these 16 Project sites.

At sites PWT and ZHQ, Tribal cultural resources have not been identified within the direct APE (project ground-disturbing areas); however, these types of resources have been noted within the 0.5-mile radius of these two Project sites. At Site PWT, the other proposed projects are located between 0.15 mile and 0.47 mile from the Project site. At Site ZHQ, the other proposed projects are located between 0.16 mile and 0.44 mile from the Project site. Cumulative impacts to Tribal cultural resources would be significant, and the contribution of sites PWT and ZHQ would be cumulatively considerable.

Mitigation measures CUL MM 1, CUL MM 3, and CUL MM 4 will be implemented at sites PWT and ZHQ to ensure that any unexpectedly encountered Tribal resources are protected and to reduce impacts to less than significant levels.

3.5 Geology/Soils

Geologic formations and soils are the oldest and most common foundation material for man-made structures. Faults, landslides, and underlying geologic formations may affect the stability of overlying structures. Erosion potential may be high in some areas and low in others. This section provides an overview of seismic hazards, landslide hazards, soil erosion potential, and potential impacts to proposed Project sites from liquefaction, unstable soils, and expansive soils.

3.5.1 Environmental Setting

3.5.1.1 *Geology*

Los Angeles County has a complex and unique geology. The Los Angeles Basin is the coastal sediment-filled plain located at the north end of the Peninsular Ranges province in southern California. It contains the central part of the city of Los Angeles as well as its southern and southeastern suburbs (both in Los Angeles and Orange counties). It is approximately 50 miles long and 25 miles wide, bounded on the north by the Santa Monica Mountains and San Gabriel Mountains, on the east by the Santa Ana Mountains, and on the south by the Pacific Ocean and the Palos Verdes Hills along the coast. The confluence of the Los Angeles and Rio Hondo rivers is the center of the basin.

The northern part of Los Angeles County sits in the Mojave geomorphic province, which lies to the north of the San Gabriel Mountains and south of the Tehachapi Mountains at the southern tip of the Sierra Nevada. The Mojave geomorphic province is a broad interior region of isolated mountain ranges separated by expanses of desert plains. It has an interior enclosed drainage and many playas. Two important fault trends control topography in a prominent northwest-southeast trend and a secondary east-west trend (apparent alignment with Transverse Ranges is significant). The Mojave province is wedged in a sharp angle between the Garlock Fault (southern boundary of the Sierra Nevada) and the San Andreas Fault, where it bends west from its northwest trend. The northern boundary of the Mojave province is separated from the prominent Basin and Range province by the eastern extension of the Garlock Fault.

The San Gabriel and Santa Monica mountains are part of the Transverse Ranges geomorphic province. The Transverse Ranges are an east-west trending series of steep mountain ranges and valleys. The east-west structure of the Transverse Ranges is oblique to the normal northwest trend of coastal California, hence the name "Transverse." The province extends offshore to include San Miguel, Santa Rosa, and Santa Cruz islands. The Transverse Ranges are among the most rapidly growing mountain ranges in the world. Great thicknesses of Cenozoic, petroleum-rich, sedimentary rocks have been folded and faulted, making this one of the important oil-producing areas in the United States (California Department of Conservation, California Geological Survey 2002a).

Geologic Hazards

Alquist-Priolo Earthquake Fault Zones occur throughout the Project area. Seismic damage to structures within and adjacent to earthquake fault zones depends on the underlying foundation materials.

Structures on competent geologic formations, such as igneous and metamorphic rock, may experience intense shaking but no liquefaction, whereas structures on unconsolidated hillsides and alluvium would be prone to landslides and liquefaction. Earthquake fault zones, seismic shaking, liquefaction zones, and landslide potential associated with Project sites are discussed below. Figure 3.5-1 provides an overview of mapped faults in the Project area.

Earthquake Fault Zones and Seismic Shaking

All of Los Angeles County lies within a seismically active area and thus is subject to some degree of seismic shaking. Figure 3.5-2 shows the severity, in terms of a percent of acceleration due to gravity and the shaking a location may experience. The map is based on the probable maximum magnitude earthquake that an area may be expected to experience in a 50-year period. Soil type and distance from the epicenter of an earthquake have a significant influence on the amount of shaking a site may experience; the closer to an active fault, the more significant shaking a location may experience. A site set on bedrock would experience shaking that is much less severe at the same distance from a seismic event than if it were above unconsolidated alluvial materials.

Alquist-Priolo Earthquake Fault Zones are special zones designated by the state to have known active traces of faults traversing the site and require special geotechnical investigations to identify the actual fault trace through the property. Figure 3.5-1 provides an overview of mapped faults in the Project area. No sites are within an Alquist-Priolo Zone.

Liquefaction Potential

Liquefaction occurs when vibrations or water pressure within a mass of soil cause the soil particles to lose contact with one another. As a result, the soil behaves like a liquid, has an inability to support weight, and can flow down very gentle slopes. This condition is usually temporary and is most often caused by an earthquake vibrating water-saturated fill or unconsolidated soil. Liquefaction may occur at sites that sit on unconsolidated younger alluvial material and have a high groundwater table (groundwater is within 25 feet of the surface). Figure 3.5-1 shows Project sites that are within areas mapped by the California Geological Survey that may be subject to liquefaction. Table 3.5-1 lists the sites within potential liquefaction zones. Sites that lie within liquefaction areas require special study; and, depending on the results of the study, may require modified foundations (piles driven or deeper foundations below the liquefaction zone) to provide a stable foundation.

Figure 3.5-1: Mapped Faults within Proposed Project Area



Figure 3.5-2: Potential Seismic Shaking Severity within Proposed Project Area

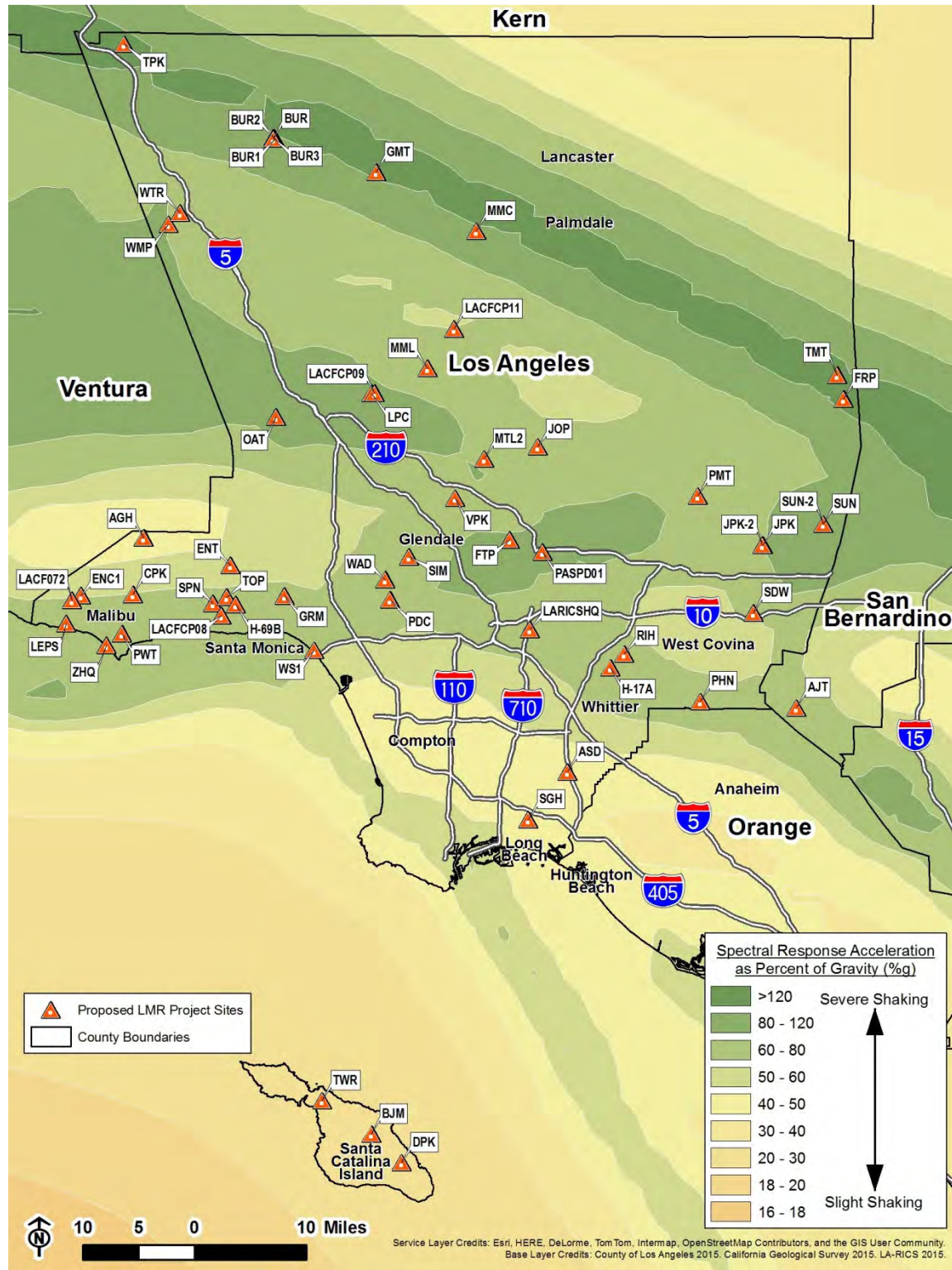


Figure 3.5-3: Geologic Hazards

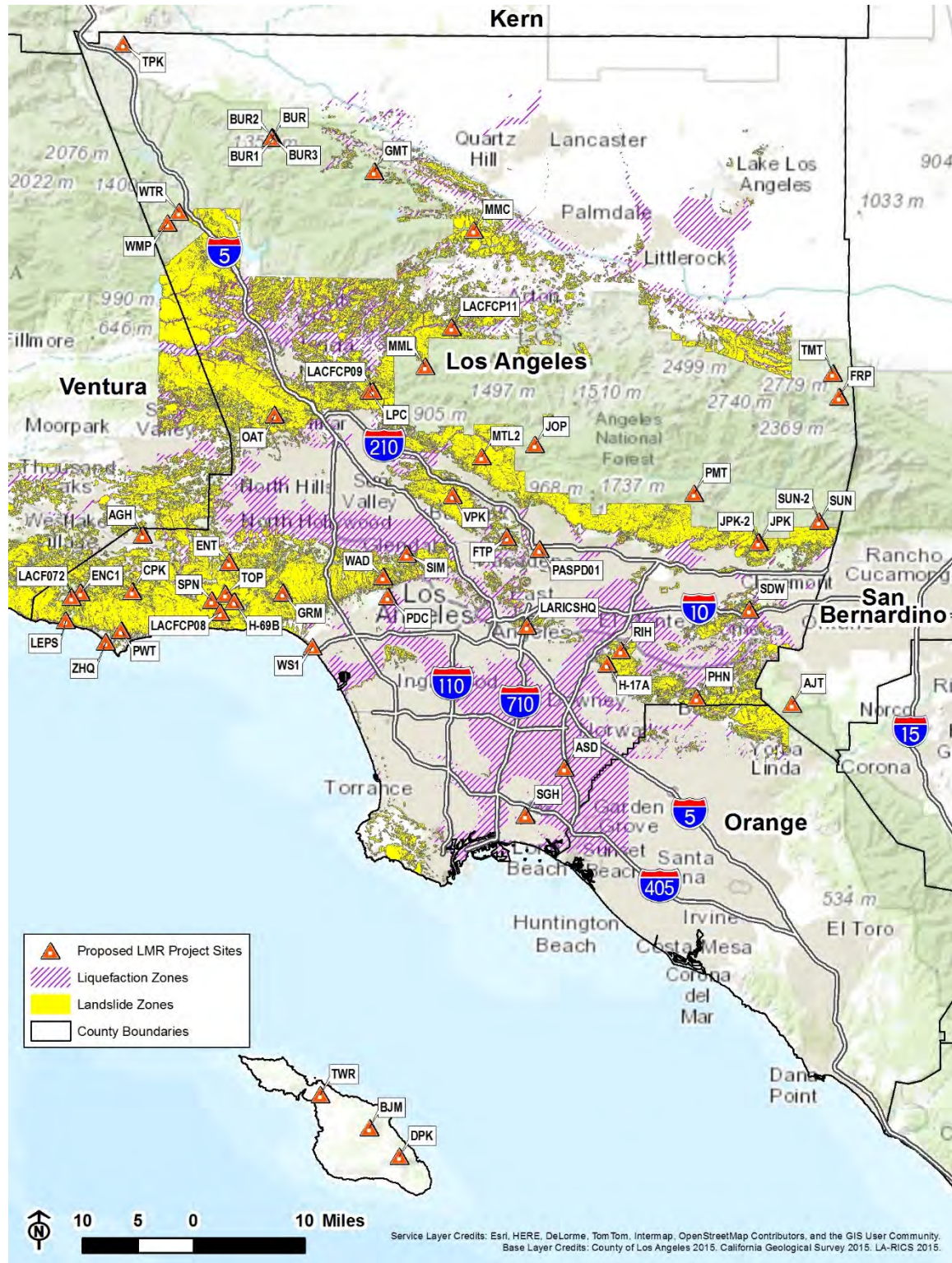


Table 3.5-1: Proposed Project Sites within Potential Liquefaction Zones

Site ID	Facility	City
ASD	Auto Square Drive	Cerritos
PDC	Pacific Design Center	West Hollywood
ZHQ	Zuma Life Guard HQ	Malibu

Source: California Department of Conservation 2006

Landslides

A landslide, also known as a landslip, is a geological phenomenon that includes a wide range of ground movements, such as rockfalls, deep failure of slopes, and shallow debris flows. Landslides can occur in offshore, coastal, and onshore environments. Although the action of gravity is the primary driving force for a landslide to occur, other contributing factors may affect the original slope stability. Typically, preconditioned factors build up specific subsurface conditions that make the area/slope prone to failure, whereas the actual landslide often requires a trigger before being released. In southern California, two primary causes may trigger a landslide: seismic shaking and/or significant amount of rain. Steep mountainous areas are also subject to debris flows, which may occur in areas that have been recently burned, followed by the significant rain events.

Figure 3.5-1: Mapped Faults within Proposed Project Area



Figure 3.5-2: Potential Seismic Shaking Severity within Proposed Project Area

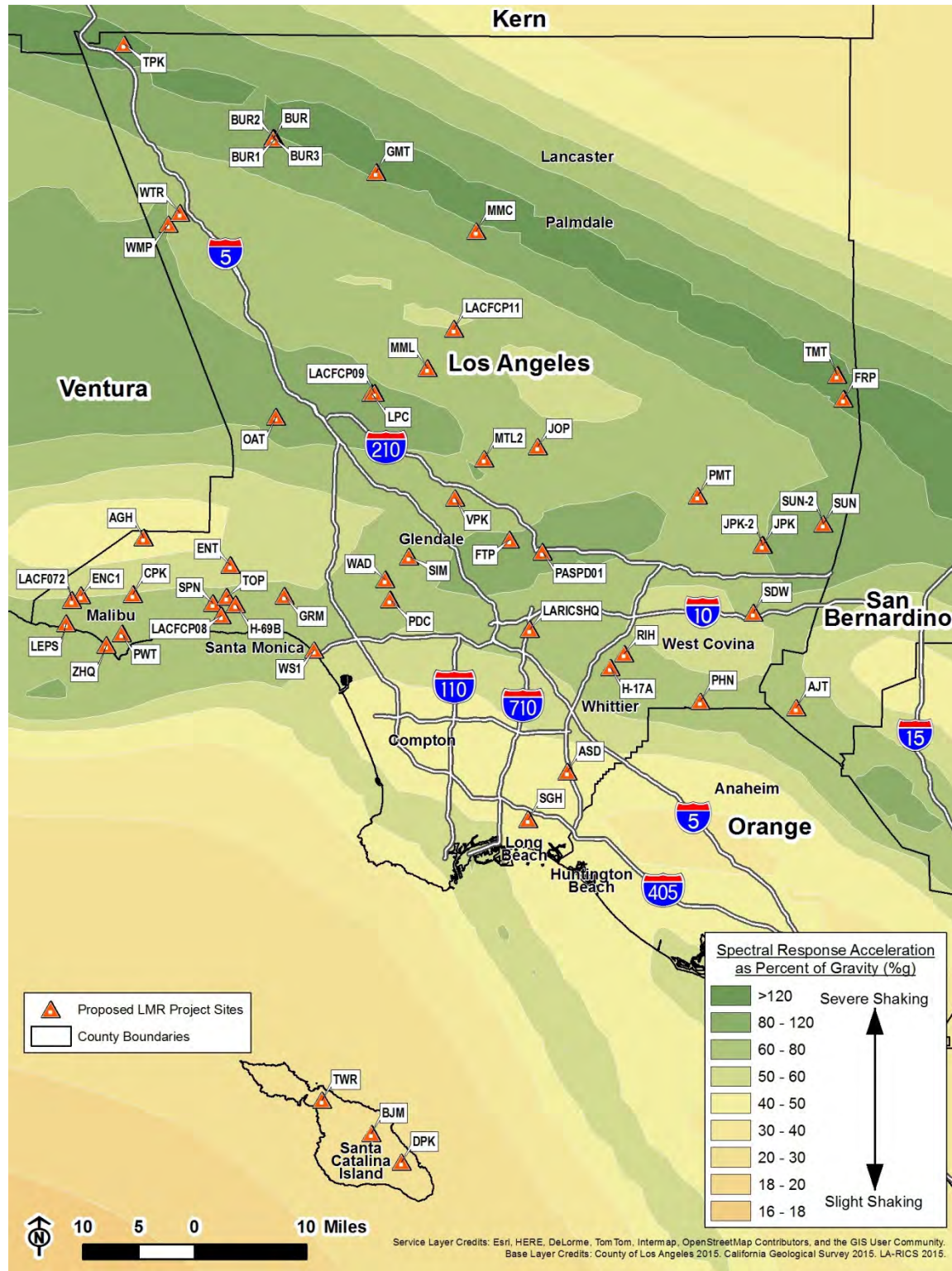


Figure 3.5-3: Geologic Hazards

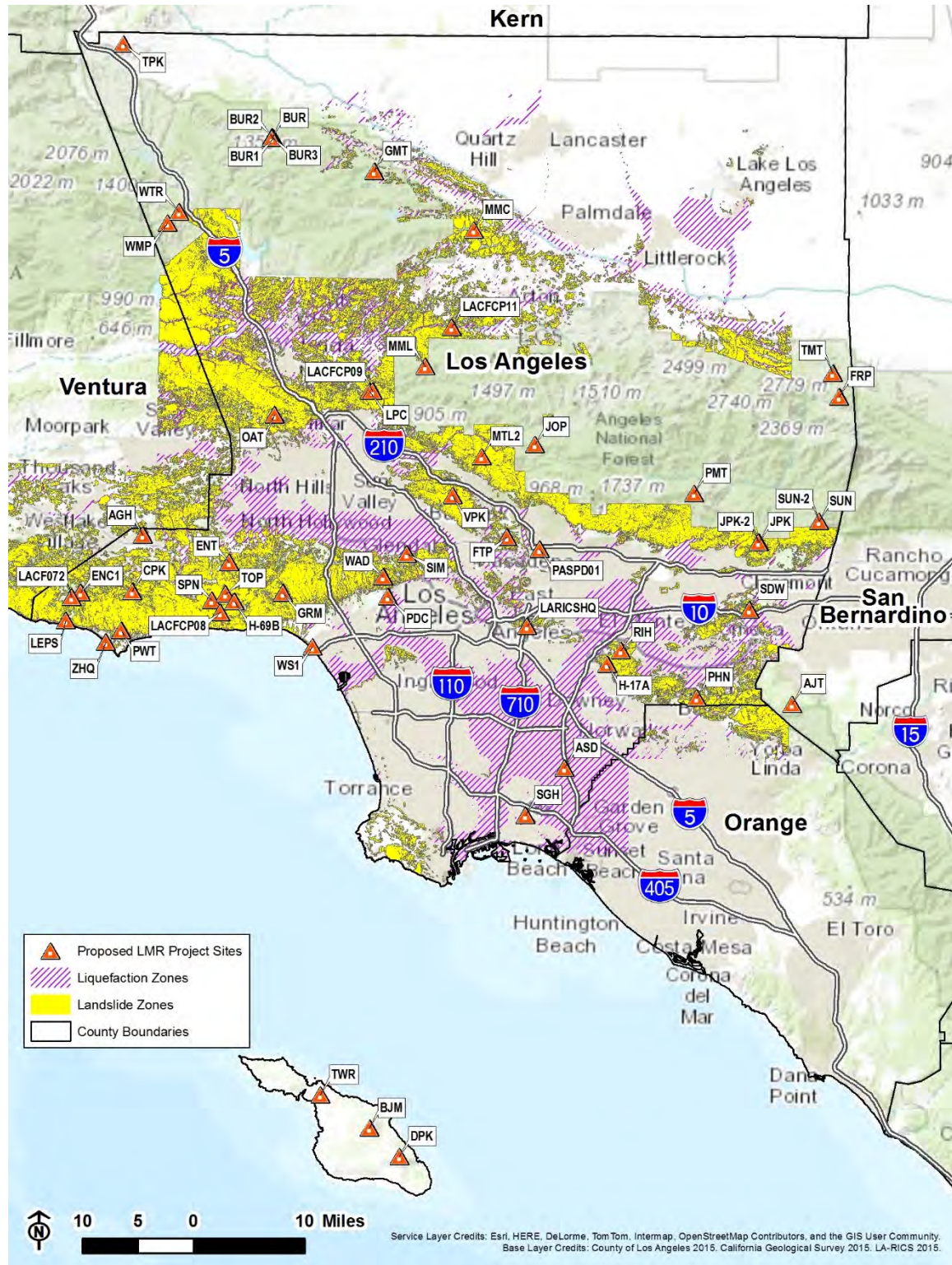


Figure 3.5-3 shows areas mapped by the California Geologic Service that have the potential for a landslide occurrence based on known geologic conditions. Table 3.5-2 lists the sites that lie within a potential landslide area.

Table 3.5-2: Proposed Project Sites within Potential Landslide/Debris Flow Areas

Site ID	Facility	City
CPK	Castro Peak	Unincorporated Los Angeles County
ENT	Entrada Tank Site	Calabasas
FTP	Flint Peak	Glendale
GRM	Green Mountain	Los Angeles
H-17A	H-17A	Whittier
JPK	Johnstone Peak	San Dimas
JPK2	Johnstone Peak-2	San Dimas
LACFCP08	Camp 8	National Park Service
LACFCP11	County CP 11	Unincorporated Los Angeles County
LEPS	Lower Encinal Pump Station	Malibu
MTL2	Mount Lukens-2	Los Angeles
RIH	Rio Hondo	Unincorporated Los Angeles County
SDW	San Dimas	San Dimas
SPN	Saddle Peak	Unincorporated Los Angeles County
TOP	Topanga Peak	Unincorporated Los Angeles County
VPK	Verdugo Peak-2	Glendale
WAD	Walker Drive	Beverly Hills

Source: California Department of Conservation 2015

3.5.1.2 Soils

Surface soils are composed of sands, silts, and clays derived from mechanical and chemical weathering of igneous, metamorphic, and sedimentary rocks. Fine-textured soils that are high in clay have low soil erodibility because the particles are resistant to detachment (cohesive soils). Coarse-textured soils, such as sandy soils, are easily detached but have low soil erodibility potential because water infiltrates them rapidly, resulting in low runoff. Medium-textured soils, such as a silt loam, have moderate soil erodibility potential because they are moderately susceptible to particle detachment and have low infiltration rates. Runoff from medium-textured soils is moderate. Soils having high silt content are especially susceptible to erosion and have a high soil erodibility potential. Silt-size particles are easily detached and tend to crust, producing high runoff rates and large runoff volumes.

Sites for the proposed Project in general fall into two major soil categories: urban and steep, rocky slopes. A large number of sites within the Los Angeles Basin do not have soils data available (Natural Resources Conservation Service 2015). These sites are urbanized and generally have a significant amount of hard surface cover, such as asphalt and concrete.

A large number of sites are characterized by steep rocky loam or steep sandy loam; soils at these sites are generally very shallow and rocky. The sites may have rock outcrops with steep to very steep slopes. The remainder of the sites varies from urban lands to sandy loams and clayey loams. Chapter 4 provides a detailed description of the soil types present at each site.

Soil Erosion

The factors contributing to potential soil erosion include climate, the physical characteristics of soils, topography, land use, and the amount of soil disturbance. In general, the loss of ground cover caused by construction activities is a primary factor contributing to an increase in potential for soil erosion. Erosion potential is also directly related to the steepness of the terrain. Because the footprint of each site is small and limited to flat ground, the potential for erosion is relatively low. The actual potential for erosion is difficult to predict without conducting a geotechnical investigation during preliminary design, as the conditions under which this hazard can occur are site-specific. City building codes regulate grading, excavations, landfill, and other construction activities that might cause or be impacted by slope or ground instability, erosion, or flooding in hillside areas. Chapter 4 provides detailed descriptions of soils for each site and the potential for erosion based on site-specific conditions.

Unstable Soils

Potential for low-level differential settlement is possible at proposed Project sites. This type of hazard primarily results in damage to property when an area settles to different degrees over a relatively short distance. The actual potential for settlement is difficult to predict, without conducting a geotechnical investigation during preliminary design, as the conditions under which this hazard can occur are site-specific. Areas with unstable soils in southern California generally fall into one of two categories: landslides or areas susceptible to liquefaction, as discussed in Section 3.5.1.1. Unstable soils may also be associated with areas with poorly engineered soils. These areas are very difficult to map and need a site-specific study to determine if existing engineered fill is suitable for building.

Expansive Soils

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in moisture content. The ability of clayey soil to change volume can result in uplift or cracking to foundation elements or other rigid structures such as slabs-on-grade and rigid pavements. Expansive soils may be present at proposed Project sites, though the actual potential for expansive soils is difficult to predict, without conducting a geotechnical investigation during preliminary design, as the conditions under which this hazard can occur are site-specific. Chapter 4 provides a detailed description of soil conditions expected at each site and identifies if the soil may be expansive.

3.5.2 Regulatory Setting

3.5.2.1 *Federal Regulatory Setting*

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977, as amended by Public Laws 101-614, 105-47, 106-503, and 108-360, created the framework for research into seismic safety of buildings and structures. The purpose of this Act as amended is to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. With the Act, Congress established the National Earthquake Hazards Reduction Program (NEHRP). The four primary NEHRP agencies that contribute to earthquake mitigation efforts are FEMA, National Institute of Standards and Technology, National Science Foundation, and U.S. Geological Survey (USGS).

All Project sites lie within seismically active areas and, as such, are subject to the Act, which requires federal preparedness and mitigation activities include “development and promulgation of specifications, building standards, design criteria, and construction practices to achieve appropriate earthquake resistance for new structures.”

Executive Order 12699

Executive Order 12699 requires an examination of alternative provisions and requirements for reducing earthquake hazards at buildings owned or leased by the federal government and those buildings with federally financed construction, grants, loans, loan guarantees, insurance programs, and licenses (42 U.S.C. 7704(f)(3, 4)) and the incorporation of seismic safety requirements into new building construction. The purpose of these requirements is to reduce risks to the lives of occupants of buildings owned by the federal government and to persons who would be affected by the failures of federal buildings in earthquakes, to improve the capability of essential federal buildings to function during or after an earthquake, and to reduce earthquake losses of public buildings, all in a cost-effective manner. A building means any structure, fully or partially enclosed, used or intended for sheltering persons or property.

3.5.2.2 *State Regulatory Setting*

California Geological Survey

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to homes, commercial buildings, and other structures and to prevent construction of buildings used for human occupancy on active faults with a hazard of surface fault rupture. The Los Angeles County Building Code (Municode 2014) provides standards and requirements for structures from these damaging effects. The most stringent standards and requirements are applied within Alquist-Priolo

Earthquake Fault Zones where faults are known to have ruptured in the past 11,000 years (Holocene time).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was passed in 1990 to mitigate other hazards associated with earthquake faults. It is the intent of the State Legislature to provide statewide seismic hazard mapping and a technical advisory program to assist cities and counties in fulfilling their responsibilities for protecting the public health and safety from the effects of strong ground shaking, liquefaction, landslides, ground failure, and other seismic hazards caused by earthquakes.

Seismic hazard zones must be identified and mapped in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. The purpose of the California Division of Mines and Geology is to incorporate information from the earthquake fault zones mapping program, the landslide hazard identification program, and the inundation maps.

Provisions under this law require that a qualified geologist and civil engineer prepare a geotechnical report for each new construction site to evaluate and assess the geologic hazards that may be present. The city and/or county in which a project is located is responsible for reviewing and approving any such report prior to construction (California Department of Conservation, California Geological Survey 1991).

California Building Standards Commission

California Building Code

The proposed Project is subject to the applicable sections of the California Building Code (CBC), which is administered by the California Building Standards Commission, Department of Building Safety. The building departments of each city (or Los Angeles County for unincorporated areas within Los Angeles County) are responsible for ensuring that CBC requirements are met, including provisions for soils and foundations to evaluate the presence of critically expansive soils or other soil problems which, if not corrected, would lead to structural defects.

3.5.2.3 Local Regulatory Setting

Los Angeles County

The Los Angeles County Department of Public Works (LACDPW) requires permittees and their contractors to implement a program to effectively control water pollution, which in turn minimizes potential increases in soil erosion, during all construction projects subject to a permit. This Project shall conform to the requirements of the following County code and permits:

- Los Angeles, California County Code Chapter 12.80 Stormwater and Runoff Pollution Control

- Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the County of Los Angeles, and the Incorporated Cities Therein, Except the City of Long Beach (Order No. 01-182, National Pollutant Discharge Elimination System [NPDES] No. CAS004001)
- NPDES General Permit No. CAS000002, as amended, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activities

San Bernardino County

Title 3, Division 5, Chapter 1 of the San Bernardino County code of ordinances (American Legal Publishing Corporation 2015) addresses the protection of health and safety of County inhabitants by controlling non-stormwater discharges to the stormwater conveyance system and by reducing pollutants in stormwater discharges. Permits are required for construction or modification of any storm drain. The County requires compliance with the permit requirements associated with construction activity subject to any NPDES permit issued by the USEPA, the State Water Resources Control Board (SWRCB), or the Regional Water Quality Control Board (RWQCB). This includes using BMPs for excavated and stockpiled soil to minimize the amount of soil transported onto adjoining properties and public rights-of-way and to minimize soil releases to the environment to the maximum extent possible.

3.5.3 Significance Criteria

The proposed Project would result in significant impact to geology and soils if any of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met:

- 1) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction?
 - Landslides?
- 2) Would the project result in substantial soil erosion or the loss of topsoil?
- 3) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- 4) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Based on the Initial Study (IS) prepared for the proposed LMR Project (Appendix A), it was determined that because the Project would not require use of septic systems, no further analysis of whether the

project would have soils incapable of adequately supporting the use of septic tanks where sewers are not available is warranted within this EIR.

3.5.4 Impact Analysis

3.5.4.1 *Proposed Project*

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Construction Impacts

None of the proposed Project sites is located within an Alquist-Priolo zone, and no active fault associated with any proposed Project site has been identified. As a result, no impact involving rupture of a known fault is anticipated.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

No impacts would be associated with rupture of a known fault during operations.

Mitigation Measures

No mitigation measures are required.

Strong seismic ground shaking?

Construction Impacts

The entire Project area is seismically active and thus is subject to some degree of seismic activity. Design and construction of the site and its elements would be required to conform to the current CBC seismic design provisions and local building codes and would be designed to minimize seismic hazards.

Roof mount site type and antennas collocated on existing towers or monopoles would not require a geotechnical report to be completed to examine existing geologic and soil conditions as no new building structure would be erected. Any new structures added on the roof or existing tower or monopole must meet current CBC seismic design provisions and local building codes to ensure that the design would avoid seismic hazards. Therefore, the impact of roof mount and collocation sites would be less than significant.

New monopoles, new towers, and existing monopoles and towers that would be extended are considered new building structures that would require site-specific seismic hazards to be evaluated during structure and foundation design. These include sites AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, and ZHQ. Seismic shaking impacts would be significant at these sites without an evaluation of site-specific soils, geology, and seismic shaking probability.

Mitigation Measures

Mitigation measure GEO MM 1 will be applied to the following sites: AGH, ASD, BJM, BUR, BUR1, BUR2, BUR3, CPK, DPK, ENC1, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACF072, LACFCP08, LACFCP09, LACFCP11, LEPS, LPC, MMC, MML, MTL2, OAT, PASPD01, PHN, PMT, PWT, RIH, SDW, SGH, SPN, SUN, SUN2, TMT, TOP, TPK, TWR, VPK, WAD, WMP, WTR, and ZHQ.

GEO MM 1 Prior to or concurrently with submittal of the application for a building permit for any portion of the proposed Project site, the project sponsor shall:

- 1) Submit to the appropriate municipality (County of Los Angeles, County of San Bernardino, or city having jurisdiction over the site) a site-specific, design-level geotechnical report reviewed and approved by both an engineering geologist licensed in the State of California and a civil engineer licensed in the State of California. The report shall comply with all applicable state and local code requirements and shall:
 - a) include an analysis of the expected ground motions at the site from known active faults using accepted methodologies
 - b) include an analysis of all potential geologic hazards including but not limited to, landslides, mudslides, liquefaction potential, identification of active faults, land spreading, and land subsidence. The report shall be prepared in accordance with and meet the requirements of the County of Los Angeles Department of Public Works (LACDPW) Manual for Preparation of Geotechnical Reports, July 1, 2013.
 - c) Specify liquefaction mitigations that shall use proven methods generally accepted by professional engineers to reduce the risk of liquefaction to a less than significant level such as:
 - i. subsurface soil improvement
 - ii. deep foundations extending below the liquefiable layers
 - iii. structural slabs designed to span across areas of non-support

- iv. soil cover sufficiently thick over liquefaction soil to bridge liquefaction zones
 - v. dynamic compaction
 - vi. compaction grouting
 - vii. jet grouting
 - viii. mitigation for liquefaction hazards suggested in the California Geological Survey's (CGS) Geology Guidelines for Evaluating and Mitigating Seismic Hazards (CGS Special Publication 117, 1997) including edge containment structures (berms, dikes, sea walls, retaining structures, compacted soil zones), removal or treatment of liquefiable soils, modification of site geometry, lowering the groundwater table, in-situ ground densification, deep foundations, reinforced shallow foundations, and structural design that can withstand predicated displacements
- d) Determine structural design requirements as prescribed by the most current version of the California Building Code, including applicable local county and local city amendments, to ensure that structures can withstand ground accelerations expected from known active faults
 - e) Determine the final design parameters for walls, foundations, foundation slabs, utilities, roadways, parking lots, sidewalks, and other surrounding improvements
- 2) Project plans for foundation design, earthwork, and site preparation shall incorporate all of the mitigations in the site specific investigations.
 - 3) The project structural engineer shall review the site specific investigations, provide any additional necessary mitigation to meet Building Code requirements, and incorporate all applicable mitigations from the investigation in the structural design plans and shall ensure that all structural plans for the project meet current Building Code requirements.
 - 4) Site construction shall not begin until:
 - a) The registered geotechnical engineer representing the applicable permitting municipality for the project site (county or city), or third party registered engineer retained to review the geotechnical reports, has reviewed each site specific geotechnical investigation, approved the final report, and required compliance with geotechnical mitigations contained in the investigation in the plans submitted for the grading, foundation, structural, infrastructure and other relevant construction permits; and

- b) The applicable permitting municipality for the project site (county or city) has reviewed all project plans for grading, foundations, structural, infrastructure and other relevant construction permits to ensure compliance with the applicable geotechnical investigation and other applicable Code requirements

Impacts after Mitigation

Application of GEO MM 1 requires a geotechnical report be prepared in accordance with applicable regulations for any proposed Project sites where a new monopole or new tower will be constructed, or where an existing monopole or tower would be extended. The geotechnical report will assess site-specific seismic ground-shaking conditions to be considered and make recommendations on the design of the foundation to minimize seismic hazards. Impacts related to seismic shaking during construction of the Project for sites with a new monopole or new tower proposed would be reduced to less than significant with Implementation of GEO MM 1.

Operation Impacts

Seismic stability associated with existing support structures for roof mount or collocation would be less than significant, as discussed above under construction impacts. All new monopoles or towers would be designed and constructed in accordance with CBC seismic design provisions and local building codes to minimize seismic hazards. Operational activities would not increase the risk posed from seismic shaking. Therefore, impacts to proposed Project operations from seismic shaking hazards would be less than significant.

Mitigation Measures

No mitigation measures are required.

Seismic-related ground failure, including liquefaction?

Three proposed Project sites are located in areas with potential for liquefaction. These are sites ASD, PDC, and ZHQ. Site PDC is a proposed roof mount site, while sites ASD and ZHQ are proposed new monopoles.

Construction Impacts

Liquefaction occurs in areas having high groundwater levels and specific underlying soil conditions that may become unstable during a seismic shaking event (earthquake). The California Geological Survey has mapped areas throughout the state that may be subject to liquefaction based on local geology and groundwater conditions. Liquefaction can directly affect the ability of a structure's foundation to remain stable to support the structure during a seismic event.

Site PDC is a proposed roof mount site that was evaluated in accordance with building standards at the time the structure at the site was constructed. Potential effects from liquefaction would also have been considered and mitigated to then-current standards at the time of foundation construction. No change to the foundation of any structure at Site PDC is proposed; therefore, new impacts associated with

liquefaction are not anticipated. The impacts associated with liquefaction at this site are considered less than significant.

At sites ASD and ZHQ, new monopoles and equipment shelters are proposed. Site-specific liquefaction potential and soil conditions would be evaluated for foundation design at new building structures. Liquefaction impacts would potentially be significant without an evaluation of site-specific soils, geology, and seismic shaking probability.

Mitigation Measures

Implementation of GEO MM 1 is required at sites ASD and ZHQ.

Impacts after Mitigation

The geotechnical report will take into account site-specific soil conditions and liquefaction potential as part of the design process for foundations at sites ASD and ZHQ. Included in the geotechnical report, which will be reviewed and approved during the building permit process at these sites, building-specific recommendations will be made to minimize the risk of proposed construction from liquefaction. Since this information will be used in evaluating issuance of a building permit at these sites, the impacts related to liquefaction at sites ASD and ZHQ would be reduced to less than significant by implementation of GEO MM 1.

Operation Impacts

For Project sites located in potential liquefaction zones, any mitigation required to reduce the hazard posed by liquefiable soils would have to be implemented during construction activities in accordance with GEO MM 1. Operational activities would not increase the risk posed from liquefiable soils. Therefore, impacts to the Project operations from potential liquefaction hazards would be less than significant.

Mitigation Measures

No mitigation measures are required.

Landslides?

The following proposed Project sites are located in areas with potential for landslides: CPK, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, VPK, and WAD. With the exception of Site WAD, all of these involve new caisson excavation associated with new monopole or lattice tower development. At Site WAD, the existing LMR antenna is proposed for extension, and the foundation there could require modification. Minor trenching would likely occur at all sites.

Construction Impacts

Landslides generally occur in steep, hilly terrain and in locations where the underlying geology is such that it may fail and slide down slope, either from natural process (heavy rain, seismic shaking, erosion)

or man-made conditions from site construction. Figure 3.5-3 shows areas mapped by the California Geologic Service that have the potential for a landslide occurrence based on known geologic conditions.

New monopoles and new towers at sites CPK, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, and VPK would require new caisson excavation as part of construction. The proposed extension of the existing monopole at Site WAD may require additional foundation support as well as deep excavation work. Deep excavation has the potential to trigger a landslide. Landslides triggered by construction activities could result in damage to on-site or off-site people or structures. Construction activities may remove soil that stabilizes the toe of landslide, add soil to the headwall of landslide, or expose pathways to the slide plane that may allow water to migrate down and destabilize the earth, causing a landslide. Though a landslide is unlikely at any site, construction activities have the potential to result in the activation of a landslide causing downslope transport of earth. Slow movement of soil and substrate could potentially damage property, while fast movement could impact both lives and property. Depending on the size and extent of the slide, impacts would extend to the end of the run-out area below the activated landslide.

Mitigation Measures

GEO MM 1 is required at sites CPK, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, VPK, and WAD.

Impacts after Mitigation

GEO MM 1 requires completion of a geotechnical report in accordance with applicable regulations for sites with a proposed new monopole, extension of a monopole, or new tower. The geotechnical report will assess site-specific potential for landslides and make recommendations on the design of the facility to minimize landslide hazards. The geotechnical investigation will identify whether a landslide potential exists and can help to characterize the size of the potential landslide. The geotechnical report will identify if the proposed Project is at the toe of the slide or top of the slide or whether the proposed grading or foundation could expose a pathway to the slide plane that runoff could access, potentially activating the slide. The report will identify site-specific mitigation recommendations to be made as part of design to reduce or eliminate any landslide hazards. The geotechnical report would be developed for review by approving authorities prior to their issuance of a building permit.

After mitigation, impacts from landslides triggered by construction would be reduced to less than significant at sites CPK, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, VPK, and WAD.

Operation Impacts

For proposed Project sites located in potential landslide areas, any mitigation required to reduce the hazard posed by landslides would have been implemented during construction in accordance with GEO MM 1. Operational activities would not increase the risk posed from landslides. Therefore, impacts to Project operations from potential landslide hazards would be less than significant.

Mitigation Measures

No mitigation measures are required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impacts

Ground-disturbing activities would expose soils and elevate the potential for erosion at all Project sites. All sites have some potential for wind erosion, which would be abated by application of water or other BMPs applicable to the site. The primary potential for erosion from construction of the proposed Project sites would be associated with runoff from sites located on slopes. The building permitting process would include the review of proposed drainage for the sites. Building plans must include positive drainage away from the facility and analyses of current storm drain intakes or projected surface runoff into local natural drainages. LACDPW, Water Resources Division, Hydrology Manual (LACDPW 2006) (or similar document for local municipalities) provides guidance on requirements for drainage at a project site that engineers follow and county and city reviewers refer to, to ensure grading plans maintain proper drainage from a site. Building plans must demonstrate that existing storm drain facilities are capable of receiving any additional runoff in urban areas without exceeding the design capacity. Many urban facilities would be built in areas that are covered in hard surfaces, producing no net change in the amount of runoff with construction of the facility. For those sites on ridges or hilltops, grading plans must include analysis of runoff potential, estimated projected flows of newly constructed hard surfaces, and determination of the potential for erosion at constructed outflow areas. Grading plans, as required, may include features to control runoff and eliminate the potential for erosion at the outflow location. All sites would be constructed using BMPs to prevent erosion and runoff. Impacts associated with all site types would be considered less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation of the Project facilities would have no potential for substantial erosion or loss of topsoil. Operation of the proposed facilities would not include any ground-disturbing activities. Therefore, less than significant impacts related to the potential for erosion would be associated with the operation of a proposed Project facility.

Mitigation Measures

No mitigation measures are required

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Construction Impacts

Proposed Project sites have been identified as being within a designated potential landslide area or designated potential liquefaction zones. The ground under these sites has the potential for soils to become unstable from Project site activities.

The risk of landslide increases with the amount of ground-disturbing activities. If the site is located in a landslide-prone area, three activities could increase the risk of landslide occurring: adding additional weight (soil) to the top of a landslide, excavating at the toe of landslide, and introducing subsurface water into a landslide. Sixteen of the 17 sites located in a potential landslide area are either new monopoles or new towers. These conditions need to be evaluated prior to construction of the new monopole or tower and would be a significant impact. One of the 17 sites (Site WAD) is a proposed 20-foot extension of an existing monopole. Should the modified monopole require foundation work, there is a potential to trigger a landslide, and the potential for impact at Site WAD would be considered significant.

Three sites (sites ASD, PDC, and ZHQ) are located in potential liquefaction zones. Site PDC is a roof mount site and no new foundation structure are required. At sites ASD and ZHQ, new monopoles are proposed. Conditions at these sites would need to be evaluated prior to construction of the new monopole or tower and therefore there is potential for a significant impact. Liquefaction zones are closely related to land spreading areas or have areas of subsidence; however, areas of subsidence and land spreading do occur outside liquefaction areas. Proposed Project activities would not contribute to the risk of liquefaction. Potential for land subsidence or land spreading could be increased with substantial withdrawal of groundwater, but proposed Project site activities do not include substantial withdrawal of groundwater. Groundwater withdrawal at any site would be limited to dewatering activities associated with caisson drilling at some sites and would not approach a substantial level that could trigger subsidence or land spreading. Therefore, proposed Project activities have little potential to increase the potential for lateral spreading, subsidence, or collapse; and impacts would be less than significant.

All remaining proposed Project sites are not located in areas identified as having unstable soils; and, therefore, no impact from construction would occur.

Mitigation Measures

Implementation of GEO MM 1 would be required at sites CPD, ENT, FTP, GRM, H-17A, JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, VPK, and WAD due to potential landslide issues. Implementation of GEO MM 1 would also be required at sites ASD and ZHQ due to potential issues associated with liquefaction.

Impacts after Mitigation

Impacts associated with unstable geologic soil conditions at sites ASD, CPK, ENT, FTP, GRM, H-17A JPK, JPK2, LACFCP08, LACFCP11, LEPS, MTL2, RIH, SDW, SPN, TOP, VPK, WAD, and ZHQ would be adequately characterized after implementation of GEO MM 1 to reduce potential issues associated with landslides and liquefaction. Impacts at these sites would be reduced to less than significant after implementation of the measure.

Operation Impacts

Any potential impacts associated with on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would have been evaluated and mitigated during the design, planning, and permitting process. Operational activities would not contribute or increase the risk of these impacts. Therefore, impacts from Project operational activities would be less than significant.

Mitigation Measures

No mitigation measures are required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impacts

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. No proposed Project sites exhibit these soil characteristics, and this hazard has no impact on construction at any site. Design of the proposed Project sites with new monopoles and new towers would be based on site-specific geotechnical analysis of the soils and would consider the potential for expansive soils. No impact relative to expansive soil-related hazards would result.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

As noted above for construction, no proposed Project sites have been identified as having expansive soils. Construction design would be based on geotechnical analysis of the soils at the site and would consider the potential for expansive soils. No impact relative to expansive soil-related hazards would result.

Mitigation Measures

No mitigation measures are required.

3.5.4.2 No Project Alternative

Under the No Project Alternative, no Project structures would be constructed, and no new equipment would be installed. No new activity would occur within or near Alquist-Priolo Earthquake Fault Zones. No ground-disturbing activities that could cause soil erosion or result in unstable geology or soils would occur. No new structures would be built that could be subject to seismic shaking, unstable soils, landslides, liquefaction, expansive soils, subsidence, or other geologic hazards. No impacts related to geology or soils would occur.

3.5.5 Cumulative Impacts

3.5.5.1 Geographic Extent

The geographic extent for consideration of geology/soils impacts is limited to the perimeter of each proposed Project site. Only two proposed Project sites were identified as having additional projects (as identified on Table 2.7-1) located within the proposed Project site boundary. This occurred at Site PDC, which is clustered with LA-RICS LTE Site WHD, and at Site PHN, which is clustered with LA-RICS LTE Site PHN. Both LTE sites were constructed in 2015. LA-RICS LTE Site PHN involved collocation of LTE and microwave antennas to an existing lattice tower, and LA-RICS LTE Site WHD involved construction of a new 70-foot monopole at the Pacific Design Center property.

3.5.5.2 Existing Cumulative Conditions

The primary concerns with geology and soils are those associated with seismicity and unstable soil conditions. Neither Site PDC nor Site PHN has been identified as having elevated conditions associated with these concerns, as discussed in the cumulative impact analysis below.

3.5.5.3 Cumulative Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

No projects were identified as within an Alquist-Priolo zone or other sources as being within an area near a known earthquake fault. No evidence exists that people or structures would potentially be exposed to substantial adverse effects. Since no impacts were identified, there would be no cumulative impacts.

- ***Strong seismic ground shaking?***

Impacts associated with strong seismic ground shaking would be related to equipment falling and striking people or property. At Site PDC, the proposed work involves construction of a roof-mounted antenna and supporting infrastructure. The only other project identified on site is LA-RICS LTE Site WHD, which is a constructed monopole and supporting infrastructure. Other than being within the same

parcel, the two do not relate to each other; and neither would contribute to a cumulative seismic impact. At Site PHN, the proposed work involves construction of a new lattice tower that could potentially fall into the same area. PHN is an unmanned facility, and the chances of this occurring are considered remote. Cumulative impacts would be less than significant.

- ***Seismic-related ground failure, including liquefaction?***

Neither Site PDC nor Site PHN is located in an Alquist-Priolo zone or in an area identified as having an elevated liquefaction potential. Additionally, the cumulatively-contributing projects (LA-RICS LTE Site WHD and LA-RICS LTE Site PHN, respectively) do not relate to these Project activities; and neither would contribute to a cumulative ground failure impact. Cumulative impacts would be less than significant.

- ***Landslides?***

Neither Site PDC nor Site PHN is located in an area identified as having the potential for landslides. Since no impact would occur, neither site has potential for a cumulative impact to occur.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

As noted above, at Site PDC the proposed work involves construction of a roof-mounted antenna and supporting infrastructure; and this is clustered with an already-built LA-RICS LTE monopole (LA-RICS LTE Site WHD). Conversely at Site PHN, the proposed work involves construction of a new lattice tower that is clustered with LA-RICS LTE Site PHN, a collocation project that has already been built. All project work would have BMPs in place to prevent soil erosion at each site. Additionally, construction activity at Site PDC would not coincide with activity at LTE Site WHD; and construction activity at Site PHN would not coincide with construction at LA-RICS LTE Site PHN. This further reduces the chance for any soil erosion. As a result, the potential for cumulative impacts at either site is considered less than significant.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Neither Site PDC nor Site PHN is located on a geologic unit or soil that has been identified as being unstable or that would become unstable as a result of Project construction. No impacts would occur from construction of either proposed Project site; therefore, no cumulative impacts would be associated with unstable geological units or soils.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Neither Site PDC nor Site PHN is located in an area identified as having expansive soils. No impacts would occur at either site; therefore, no cumulative impacts would be associated with unstable geological units or soils.

3.6 Greenhouse Gas Emissions

3.6.1 Environmental Setting

Climate change refers to global and regional variations in the normal weather of the earth (wind patterns, storm intensity, precipitation, and temperature) that occur over time. While the earth has gone through many natural changes in climate in its history, there is general agreement that the earth's climate is currently changing at an accelerated rate and will continue to do so for the foreseeable future. Anthropogenic (human-caused) greenhouse gas (GHG) emissions contribute to this rapid change. Carbon dioxide makes up the largest component of these GHG emissions, stemming mostly from fossil-fuel combustion. Other prominent sources of GHGs include methane (CH₄) and nitrous oxide (N₂O), which are primarily transportation related.

Many GHGs occur naturally. Water vapor is the most abundant GHG and makes up approximately two-thirds of the natural greenhouse effect; however, burning of fossil fuels and other human activities are adding to the concentration of GHGs in the atmosphere. Many GHGs remain in the atmosphere for time periods ranging from decades to centuries.

3.6.2 Regulatory Setting

3.6.2.1 Federal Regulatory Setting

Climate change is associated with long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to GHG emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change by the United Nations and World Meteorological Organization in 1988 has led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity, including carbon dioxide, methane, nitrous oxide, tetrafluoromethane, hexafluoroethane, sulfur hexafluoride, HFC-23 (fluoroform), HFC-134a (s, s, s, 2-tetrafluoroethane), and HFC-152a (difluoroethane).

Although climate change and GHG reduction are concerns at the federal level; no federal regulations or legislation have been enacted that specifically address GHG emissions reductions and climate change at the project level. Climate change and its associated effects are being addressed through various efforts at the federal level to improve fuel economy and energy efficiency, such as the "National Clean Car Program" and Executive Order 13514 — Federal Leadership in Environmental, Energy and Economic Performance.

Executive Order 13514 is focused on reducing GHGs internally in federal agency programs and operations but also directly through federal agencies participating in the interagency Climate Change Adaptation Task Force, which is engaged in developing a U.S. strategy for adaptation to climate change.

On April 2, 2007, in *Massachusetts v. EPA*, 549 U.S. 497 (2007), the Supreme Court found that greenhouse gases are air pollutants covered by the Clean Air Act and that the EPA has the authority to regulate GHGs. The Court held that the EPA Administrator must determine whether or not emissions of GHGs from motor vehicles cause or contribute to air pollution which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision.

On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the Clean Air Act:

- **Endangerment Finding:** The Administrator found that the current and projected concentrations of the six key well-mixed greenhouse gases — carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride — in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator found that the combined emissions of these well-mixed greenhouse gases from motor vehicle engines contribute to the greenhouse gas pollution, which threatens public health and welfare.

Although these findings did not themselves impose any requirements on industry or other entities, this action was a prerequisite to finalizing the EPA's Proposed Greenhouse Gas Emission Standards for Light-Duty Vehicles, which was published on September 15, 2009 (USEPA OTAQ 2009). On May 7, 2010, the final Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards was published in the Federal Register.

EPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. These next steps include developing the first-ever GHG regulations for heavy-duty engines and vehicles as well as additional light-duty vehicle GHG regulations. These steps were outlined by President Obama in a memorandum on May 21, 2010 (White House 2010).

The final combined EPA and NHTSA standards that make up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The standards require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon (mpg) if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards are estimated to reduce GHG emissions by 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012-2016).

On January 24, 2011, the EPA along with the U.S. Department of Transportation and the State of California announced a single time frame for proposing fuel economy and GHG standards for model years 2017-2025 cars and light-trucks. Shortly thereafter (November 16, 2011), the new standards were proposed to be implemented during the same model year time frame, which signals continued collaboration that could lead to an extension of the current National Clean Car Program.

3.6.2.2 State Regulatory Setting

With the passage of several pieces of legislation, including State Senate and Assembly Bills and Executive Orders, California launched an innovative and proactive approach to dealing with GHG emissions and climate change at the state level.

Executive Order S-3-05

Executive Order S-3-05, signed in June 2005 by Governor Arnold Schwarzenegger, states that California is vulnerable to the impacts of climate change and that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To address those concerns, the Executive Order established the state's first GHG emissions targets:

- Reduce GHG emissions to 2000 levels by 2010
- Reduce GHG emissions to 1990 levels by 2020
- Reduce GHG emissions to 80 percent below 1990 levels by 2050

This Executive Order requires biannual reports on progress made toward meeting these targets and the global warming impact on California.

Global Warming Solutions Act of 2006

In September 2006, the State Legislature passed, and Governor Schwarzenegger signed, Assembly Bill (AB) 32 (Chapter 488, States of 2006), the Global Warming Solutions Act of 2006, which set the 2020 GHG emissions reduction goal into law. It directed the California Air Resources Board (CARB) to begin developing discrete early actions to reduce GHG emissions while also preparing the Climate Change Scoping Plan, which outlines a framework of measures that would eventually be adopted and implemented to reach AB 32 goals (CARB 2014b). CARB approved the Climate Change Scoping Plan in 2008 and updated it in May 2014. Regulations are being phased in over time. Adopted regulations include the 33 percent Renewable Portfolio Standard, the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Relevant recommended actions of the updated Climate Change Scoping Plan are generally related to transportation/goods movement and gases with a high potential to result in global warming.

Reporting of GHG emissions by major sources is required by AB 32. In 2007, CARB established the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. Revisions to this GHG reporting regulation were approved by the California Office of Administrative Law, which became effective on

January 1, 2012. Facilities that emit 10,000 metric tons of carbon dioxide equivalents⁷ (MTCO₂e) or more of GHG emissions per year are required to submit annual reports to CARB.

Senate Bill 97

Senate Bill (SB) 97 was passed by the State Legislature and approved by Governor Schwarzenegger in August 2007. SB 97 acknowledges that climate change is a prominent environmental issue that requires analysis under the California Environmental Quality Act (CEQA). The California Natural Resources Agency adopted amendments to the CEQA Guidelines to address the analysis and mitigation of GHG emissions. The amendments to the CEQA Guidelines implementing SB 97 became effective on March 18, 2010.

Executive Order B-16-2012

Executive Order B-16-2012, signed in March 2012 by Governor Edmund G. Brown, ordered CARB, the California Energy Commission, the California Public Utilities Commission (CPUC), and other relevant agencies to establish benchmarks to achieve a myriad of goals set for 2015, 2020, and 2025 to reduce GHG emissions in California. Goals include accommodation of zero-emission vehicles in major metropolitan areas, expansion of manufacturing capabilities of zero-emission vehicles, accessibility of zero-emission vehicles to mainstream consumers, and integration of electrical vehicle charging into the electricity grid. Governor Brown also set a target such that GHG emissions from the transportation sector would be reduced to 80 percent less than 1990 levels by 2050.

Executive Order B-30-15

In April 2015, Governor Brown signed Executive Order B-30-15, establishing a new interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030. The interim reduction target was established in order to ensure California meets its goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. Executive Order B-30-15 requires state agencies to consider climate change in their planning and investment decisions, giving priority to actions that reduce GHG emissions.

3.6.2.3 Local Regulatory Setting

The Project is located within portions of the Mojave Desert Air Basin (MDAB) under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD) and portions of the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would need to adhere to the following AVAQMD and SCAQMD regulations:

- AVAQMD Regulation XXX, Rule 3011 (2011) – Greenhouse Gas Provisions of Federal Operating Permits (FOPs)
 - Provides a mechanism for the AVAQMD to incorporate requirements for the regulation of GHGs into FOPs

⁷ A metric used to compare emissions of various greenhouse gases. It is the mass of carbon dioxide that would produce the same estimated radiative forcing as a given mass of another greenhouse gas. Carbon dioxide equivalents are computed by multiplying the mass of the gas emitted by its global warming potential.

- Under federal Tailoring Rule (Federal Register Vol. 75, No. 106, p. 31514) only the largest GHG emitters are covered: power plants, refiners, cement production facilities
- SCAQMD Regulation XXVII, Rule 2701 & 2702 (2010) – Climate and Greenhouse Gases
 - Rule 2701 establishes a voluntary program to encourage, quantify, and certify voluntary, high-quality certified GHG reductions in the SCAQMD
 - Rule 2702 creates a program for GHG emission reduction in the SCAQMD, which funds reduction projects or purchases them from other parties

In addition, the Project includes sites within the jurisdictions of Los Angeles County, San Bernardino County, and 16 cities. GHGs and climate change are managed through land use and development planning practices, which are implemented through the cities' general planning processes. The following are county and city plans applicable to GHGs:

- City of Agoura Hills – 2035 General Plan Environmental Impact Report (2010), Chapter 4.15 Climate Change
 - A lead agency is required to make a good faith effort, based on available information, to describe, calculate, or estimate the amount of GHGs associated with a project, including those emissions associated with energy consumption and vehicular traffic.
- City of Burbank – 2035 General Plan (2013), Chapter 2 Air Quality and Climate Change Element, Goal 3 -Reduction of GHGs and Goal 4 - Climate Change
 - Goal 3: Develop and adopt a binding, enforceable reduction target and mitigation measures and actions to reduce communitywide GHG emissions within Burbank by 15 percent and 30 percent from current levels in 2020 and 2035, respectively.
 - Goal 4: Evaluate the potential effects of climate change on Burbank's human and natural systems and develop strategies for the City to respond appropriately.
- City of Chino Hills – 2025 General Plan (2010), Chapter 9 Open Space and Conservation Element, Goal OSC-5 Reduce GHG emissions by 15 percent below 2005 levels by 2030
 - The City will work with business owners to support their efforts to reduce GHG emissions in achievement of this goal.
- City of Los Angeles – GreenLA, An Action Plan to Lead the Nation In Fighting Global Warming, Adaptation – Climate Proof Los Angeles
 - Improve capacity to respond to an emergency through education and outreach among other adaptive measures.
- City of West Hollywood – 2035 General Plan (2011), Climate Action Plan

The plan identifies seven mitigation strategies to reduce 2035 communitywide GHG emissions by 20 percent to 25 percent below 2008 levels including: community leadership and engagement, land use

and community design, transportation and mobility, energy use and efficiency, water use and efficiency, waste reduction and recycling, and green space strategy.

- Unincorporated Los Angeles County (ULAC) - Community Climate Action Plan 2020

To reduce the impacts of climate change, the County has set a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020.

3.6.3 Significance Criteria

Appendix G of the CEQA Guidelines and Guidelines Section 15064.4 provide criteria for evaluating the significance of a project's environmental impacts on GHGs. For the purposes of this EIR, implementation of the proposed Project would have a significant GHG impact if any of the following significance criteria are met:

- 1) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

3.6.3.1 AVAQMD

The AVAQMD has established the following significance threshold for GHG emissions: projects generating total emissions (direct and indirect) in excess of 100,000 tons annually or 548,000 pounds daily (AVAQMD 2011) would result in a significant impact.

3.6.3.2 SCAQMD

The SCAQMD has established a significance threshold of 10,000 metric tons per year for CO₂ equivalents (MTCO₂e) including nitrogen dioxide and methane from industrial facilities (SCAQMD 2008).

3.6.4 Impact Analysis

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction and Operation Impacts

Detailed analysis for each site is provided in Chapter 4. Direct emissions of GHGs in terms of CO₂e from construction of the proposed Project sites were determined using the California Emission Estimator Model (CalEEMod) v. 2013.2.2 developed for the California Air Pollution Control Officers Association (CAPCOA) by SCAQMD and other California air districts (EIC 2013). The model quantifies direct emissions from construction for a variety of land use projects. A composite site representing a maximum construction activity scenario was assumed for each proposed Project site.

Direct emissions of GHGs associated with the operation of the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB and 3 proposed Project sites in the MDAB. The generator test would last one hour at each site, and test days would be evenly distributed during each month of the year. For the analysis, an average of 11.75 trips per week to sites within the SCAB was assumed, with three maintenance trips on four weekdays per week and three additional weekday trips per month. For sites in the MDAB, the three maintenance trips were assumed to occur on the same day, once per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis. The CalEEMod emissions model provides power rating data on the project summary input screen (EIC 2013).

Total annual GHG emissions for all 54 proposed Project sites, 51 in the SCAB and 3 located in the MDAB, are shown in Table 3.6-1. Per guidance provided by the SCAQMD (SCAQMD 2008), construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. As shown in Table 3.6-1, the estimated annual emissions of GHG resulting from the construction and operation of all 54 proposed Project sites is substantially below all AVAQMD and SCAQMD GHG thresholds. Direct emissions of GHGs from the project construction and direct and indirect emissions of GHGs from the project operation would have a less than significant impact on the environment.

Table 3.6-1: Construction and Operational GHG Emissions for all Sites within SCAB and MDAB

GHG Emission Source	Annual Emissions (metric tons)
Construction (Amortized over 30-year facility life) ¹	220.13
Routine Maintenance	32.12
Generator Testing	16.44
Indirect (Electricity Generation)	2,074.79
Total	2,343.48

¹ Amortization over 30 years is suggested by the South Coast Air Quality Management District in its draft guidance for CEQA analysis of GHG emissions (SCAQMD 2008).

Mitigation Measures

No mitigation measures are required.

GHG-2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction and Operation Impacts

The CARB 2015 Edition of the California GHG Emission Inventory; *California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators* summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances (CARB 2015). Trends in GHGs indicate a 1.5-million MTCO₂e decrease from 2012 to 2013 and 7 percent decrease since peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants⁸. During the period from 2000 to 2013, California per capita GHG emissions continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles in 2010 were estimated at 7.9 million MTCO₂e (Unincorporated Los Angeles County 2015). Of these total emissions, building energy use is the largest source of emissions (49 percent). Transportation emissions from on- and off-road vehicles are the second largest source of emissions (42 percent). The third largest source is community waste generation (7 percent). The remaining sources are water conveyance and wastewater generation (2 percent), agriculture (0.4 percent), and stationary sources (0.02 percent). Trends for greater Los Angeles County, including unincorporated areas, indicated an overall reduction for the period from 2005 to 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48 percent. The Unincorporated Los Angeles County *Community Climate Action Plan 2020* projects a 10-percent reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11-percent emissions reductions for the period from 2013 to 2020.

As shown in Table 3.6-1, 88.5 percent of the GHG emissions from the proposed Project are associated with the electrical needs for equipment operation; and the remaining 11.5 percent are for construction and maintenance of the proposed Project sites. Compliance with the SCAQMD and AVAQMD significance thresholds for GHGs would not trigger mandatory reporting of Project emissions to CARB and demonstrates that the proposed Project's contribution to statewide and Unincorporated Los

⁸ Combined-cycle power plants make use of waste heat from natural gas combustion to power steam turbines, producing as much as 50 percent more energy from the combustion cycle.

Angeles County emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measures

No mitigation measures are required.

3.6.4.1 No Project Alternative

Under the No Project Alternative, none of the 54 proposed Project sites would be constructed. Therefore, no greenhouse emissions would occur from construction equipment, worker commuting vehicles, or material transport trucks. No mitigation measures would be needed to ensure that emission thresholds are not exceeded; however, existing communication sites would continue to operate and be inspected, maintained, and repaired.

3.6.5 Cumulative Impacts

The area of geographic consideration for cumulative impacts of GHG emissions is global. Climate change is a global problem, and GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Impacts of GHGs are also borne globally.

From the standpoint of CEQA, GHG impacts to climate change are inherently cumulative. Significant cumulative impacts would occur if the proposed Project were to directly or indirectly result in an increase in GHG emissions compared to existing conditions; conflict with AB 32, or be inconsistent with the state's ability to achieve the Executive Order B-30-15 and S-3-05 targets of reducing California's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Compliance with the SCAQMD and AVAQMD significance thresholds for GHGs would not trigger mandatory reporting of Project emissions to CARB. This demonstrates that the potential contribution of the proposed Project would not conflict with downward trends in emissions from transportation and electric power sources by approximately 11 to 20 percent from peak levels during the period from 2000 to 2013 (CARB 2015).

The AVAQMD and SCAQMD emission thresholds were set to ensure that individual projects, when combined with other air pollution-emitting activities in their jurisdictions, do not result in significant GHG impacts. In developing their GHG thresholds, the districts made various assumptions about growth in population and housing and indicators of economic activity, including transportation activity as indicated by vehicle miles traveled. The proposed Project is not growth-inducing and would not result in an economic activity that would be inconsistent with these assumptions in forecasting district-wide emissions.

Although the Project would result in an increase of GHG emissions as described in Table 3.6-1, GHG emissions are less than AVAQMD and SCQAMD significance thresholds and would not conflict with AB 32 or the state's ability to achieve the Executive Order B-30-15 and S-3-05 targets of reducing

California's GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. Project GHG emissions would not be cumulatively considerable.

3.7 Hazards and Hazardous Materials

This section describes the known and potential hazards and hazardous materials associated with construction of the proposed Project sites located in Los Angeles and San Bernardino counties. The section analyzes potential impacts on and from hazards and hazardous materials associated with construction and operation of the proposed Project and Project Alternative.

3.7.1 Environmental Setting

3.7.1.1 **Hazardous Wastes**

Past hazardous waste or hazardous material releases at a proposed Project site or adjacent properties could have implications on site selection because of the potential for worker exposure to contaminated soil and/or groundwater as well as financial risks from acquiring or leasing a contaminated site. To address these concerns, each proposed Project site was evaluated through completion of an environmental database records search (Envirostor 2015; Geotracker 2015) that identified the potential presence of recognized environmental conditions (RECs). Releases of hazardous materials to soil or groundwater on or within a 1.0-mile radius of each proposed Project site were identified. Records reviewed included but were not limited to:

- Federal environmental databases for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)
- State and tribal-equivalent National Priority List (NPL) and CERCLIS databases (EPA 2015)
- State, tribal, and local government solid waste disposal site lists
- State, tribal, and local hazardous waste/contaminated site lists
- Water Quality Control Board Leaking Underground Storage Tank (LUST) online database (RWQCB 2015)
- State, tribal, and local registered storage tank lists and leaking storage tanks lists
- RWQCB Geotracker database and California Department of Toxic Substance Control (DTSC) Envirostor database

After completion of the records search, including an Environmental Data Resources Inc. (EDR Report) for each site, RECs potentially encountered during construction activities were identified for each proposed Project site. The findings are presented below.

Existing Hazardous Waste Sites and Sites within 1 mile of a National Priority List

One proposed Project site is located within 1.0 mile of facilities listed on USEPA's Superfund Program's NPL site (USEPA 2012). The site is listed in **Error! Reference source not found.**

Table 3.7-1: Proposed Project Sites within 1 mile of an NPL Site

Site ID (Name)	Address	NPL Site	Groundwater Depth at Site (Feet)
SDW	310 Via Blanca, San Dimas, CA 91773	Eastshore Recreational Vehicle is part of an NPL Site. EPA ID CAD983566712. Site is located 0.4 mile from Project site	Unknown, downgradient from site

High Potential for RECs

One proposed Project site has been identified as having a high potential to encounter RECs on site during intrusive site-related activities and is described in **Error! Reference source not found..** Criteria for sites to be identified as having High potential include but are not limited to:

- Sites that have active LUST; or
- Sites with other ongoing regulatory enforcement actions and remedial activities.

Table 3.7-2: Proposed Project Sites with High Potential to Encounter Recognized Environmental Concerns

Site ID	Address	Comments	Groundwater Depth at Site (Feet)
PDC (Pacific Design Center)	720 San Vicente Blvd. West Hollywood, CA 90069	Past on-site LUSTs have been remediated. MMRP FUDS less than 660 feet upgradient that requires evaluation (Schrillo Aero Tool). Two ongoing LUST remedial actions within 660 feet to 0.25 mile from Project site (Southern CA RTD and Sunlin Inc.). Potential for human contact with contamination in soil, soil vapor, and groundwater during intrusive activities.	25

Medium Potential for RECs

One proposed Project site is identified as having a medium potential to encounter RECs on site during intrusive site-related activities and is presented in **Error! Reference source not found..** Criteria for sites to be identified as having medium potential include but are not limited to:

- Sites with a closed Cortese list site
- Sites with a closed LUST site within the site boundary

- Site is upgradient from an NPL or other Cortese List site

Table 3.7-3: Proposed Project Sites with Medium Potential to Encounter Recognized Environmental Concerns

Site ID	Address	Comments	Groundwater Depth at Site (Feet)
RIH (Rio Hondo)	Near Workman Mill Road Hacienda Heights, CA 91745	MMRP FUDS less than 75 feet from Project site that requires evaluation (NIKE Battery 14). Potential for human contact with contamination in soil or groundwater during intrusive activities. Site is adjacent to closed landfill.	Depth to groundwater unknown
MMRP FUDS = Military Munitions Response Program Formerly Used Defense Site			

Low Potential for RECs

Error! Reference source not found. lists proposed Project sites that have a low potential to encounter RECs during intrusive activities. Criteria for sites to be identified as having low potential include but are not limited to:

- UST or AST are present on site without a history of RECs being released; or
- Adjacent off-site REC releases have been remediated; however, potential exists that past migration of RECs to the proposed Project site may have occurred.

Table 3.7-4: Proposed Project Sites with Low Potential to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

Site ID	Site Name	Address
CPK	Castro Peak	928 Latigo Canyon Road Malibu, CA 90265
ENC1	Encinal 1 (Fire Camp 13)	1250 S. Encinal Canyon Road Malibu, CA 90265
LACF072	County FS 72	1832 S. Decker Road Malibu, CA 90265
LARICSHQ	LA-RICS Headquarters Building	2525 Corporate Place Monterey Park, CA 91754
PASPD01	Pasadena Police Dept.	Pasadena Police Dept. Pasadena, CA 91101
SGH	Signal Hill	2321 Stanley Ave, Signal Hills CA 90755
SIM	Simpsons Building	Building 42, Fox Lot, 10201 West Pico Blvd, Los Angeles CA 90064

No Potential for RECs

Proposed Project sites identified as having no potential to encounter RECs on site during intrusive site-related activities are listed in **Error! Reference source not found.** Criteria for sites to be identified as having no potential include but are not limited to:

- No active Cortese list sites, NPL sites, or LUST sites within site boundary
- No LUST sites within 0.25 mile of facility
- No NPL sites within 1.0 mile of facility
- No past Cortese list sites within site boundary
- adjacent off-site REC releases have been remediated; however, no potential exists that past migration of RECs to the proposed Project sites may have occurred

Table 3.7-5: Proposed Project Sites with No Concern to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

Site ID	Site Name
AGH	Agoura Hills
AJT	Aerojet
BJM	Black Jack Peak
BUR	Burnt Peak
BUR1	Burnt Peak - 1
BUR2	Burnt Peak - 2
BUR3	Burnt Peak - 3
DPK	Dakin Peak
ENT	Entrada Tank Site
FRP	Frost Peak (Upper Blue Ridge)
FTP	Flint Peak
GMT	Grass Mountain
GRM	Green Mountain
H-17A	H-17A
H-69B	H-69B
JOP	Josephine Peak
JPK	Johnstone Peak-1
JPK2	Johnstone Peak-2
LACFCP08	Camp 8
LACFCP09	Camp 9
LACFCP11	Camp 11
LEPS	Lower Encinal Pump Station
LPC	Loop Canyon
MMC	Mount McDill
MML	Magic Mountain Link
MTL2	Mount Lukens-2
OAT	Oat Mountain-1

Table 3.7-5: Proposed Project Sites with No Concern to Encounter Recognized Environmental Concerns during Intrusive Site-Related Activities

Site ID	Site Name
PHN	Puente Hills
PMT	Pine Mountain
PWT	Portshhead Tank
SPN	Saddle Peak
SUN	Sunset Ridge
SUN2	Sunset Ridge-2
TMT	Table Mountain
TOP	Topanga Peak
TPK	Tejon Peak
TWR	Tower Peak
VPK	Verdugo Peak-2
WAD	Walker Drive
WMP	Whittaker Middle Peak
WS1	100 Wilshire
WTR	Whittaker Ridge
ZHQ	Zuma Life Guard HQ

Hazardous Materials near Schools

The potential for release of hazardous materials to the environment near schools are of concern. Proposed Project sites located within 0.25 mile of a school are listed in **Error! Reference source not found..**

Table 3.7-6: Proposed Project Sites Within 0.25 Mile of a School

Site ID	Site Name	Address	School
LARICSHQ	LA-RICS Headquarters Building	2525 Corporate Place Monterey Park, CA 91754	East Los Angeles County Community School 1260 S. Monterey Pass Road Monterey Park, CA 91754
PASPD001	Pasadena Police Department	214 Ramona Street Pasadena CA 91101	University of Phoenix Pasadena Learning Center 299 N. Euclid Avenue Pasadena, CA 91101

3.7.1.2 Airports and Airstrips

One LMR project site is located within an Airport Land Use Plan (ALUP) boundary. SDW is located within Area E of the Brackett Field Airport Land Use Compatibility Plan (ALUCP). No sites are located within an

ALUCP or within 2 miles of a public airport or public use airport that does not have an approved ALUCP. No LMR sites are within 2 miles of a private airstrip.

3.7.1.3 Wildland Fire Risk

USFS and NPS have management and administrative responsibility for certain federal lands proposed for siting of LMR system components. Each agency has the legal authority to protect those lands from the effects of wildfire. This is primarily accomplished through the implementation of resource management and fire management plans that contain policies addressing vegetation management and creation of defense zones to address the Wildland/Urban Interface.⁹

California PRC Sections 4201-4204 and Government Code Sections 51175-51189 require identification of fire hazard severity zones within the State of California and specify standards for brush clearance around buildings or structures located in, upon, or adjoining any mountainous, forest, brush, or grassland area. Fire hazard severity zones are measured qualitatively, based on vegetation, topography, weather, crown fire potential (a fire's tendency to burn upwards into trees and tall brush), and ember production and movement within the area in question. Fire prevention areas considered to be under state jurisdiction are referred to as "state responsibility areas." In state responsibility areas, the California Department of Forestry and Fire Protection is required to delineate three hazard ranges: moderate, high, and very high. In "local responsibility areas," which are under the jurisdiction of local entities (e.g., cities, counties), local agencies are required only to identify very high fire hazard severity zones. Sites identified in these areas are presented in **Error! Reference source not found.**

Though under federal jurisdiction, all of the proposed Project sites located in the SMMNRA and ANF are assumed to be within a very high fire hazard severity zone and are included in **Error! Reference source not found.**

Table 3.7-7: Proposed Project Sites in Areas Designated as a Very High Fire Hazard Severity Zone

Site ID	Site Name	Responsibility Area (Federal, State, or Local)
AGH	Agoura Hills	LRA
AJT	AeroJet	LRA
BJM	Black Jack Peak	SRA
BUR	Burnt Peak	Federal
BUR1	Burnt Peak 1	Federal
BUR2	Burnt Peak 2	Federal
BUR3	Burnt Peak 3	Federal
CPK	Castro Peak	SRA
DPK	Dakin Peak	SRA
ENC1	Encinal 1 (Fire Camp 13)	SRA

⁹ The wildland fire management programs of these agencies are highly integrated, and they operate from a common policy "1995 Federal Wildland Fire Management Policy (revised in 2001)," the "2009 Guidance for Implementation of Federal Wildland Fire Management Policy," the "Interagency Standards for Fire and Fire Aviation Operations," "part 620 of the DOI Departmental Manual," and the "Forest Service Manual 5100."

Table 3.7-7: Proposed Project Sites in Areas Designated as a Very High Fire Hazard Severity Zone

Site ID	Site Name	Responsibility Area (Federal, State, or Local)
ENT	Entrada Tank Site	LRA
FRP	Frost Peak	Federal
FTP	Flint Peak	LRA
GMT	Grass Mountain	Federal
GRM	Green Mountain	LRA
H-17A	H-17A	LRA
H-69B	H-69B	SRA
JOP	Josephine Peak	Federal
JPK	Johnstone Peak	Federal
JPK2	Johnstone Peak 2	Federal
LACF072	County Fire Station 72	SRA
LACFCP08	County CP 08	Federal
LACFCP09	County CP 09	Federal
LACFCP11	County CP 11	Federal
LEPS	Lower Encinal Pump Station	LRA
LPC	Loop Canyon	Federal
MMC	Mount McDill	LRA
MML	Magic Mountain Link	Federal
MTL2	Mount Lukens 2	Federal
OAT	Oat Mountain-1	SRA
PHN	Puente Hills	SRA
PMT	Pine Mountain	Federal
PWT	Portshead Water Tank	Federal
RIH	Rio Hondo	SRA
SDW	San Dimas	LRA
SIM	Simpsons Building	LRA
SPN	Saddle Peak	SRA
SUN	Sunset Ridge	Federal
SUN2	Sunset Ridge 2	Federal
TMT	Table Mountain	Federal
TOP	Topanga Peak	SRA
TPK	Tejon Peak	SRA
TWR	Tower Peak	SRA
VPK	VPK	LRA
WAD	Walker Drive	LRA
WMP	Whitaker Middle Peak	Federal
WTR	Whitaker Ridge	Federal
ZHQ	Zuma Life Guard HQ	LRA

Source: California Department of Forestry and Fire, Los Angeles County Fire Department. Sites on the Angeles National Forest and Santa Monica Mountains National Recreation Area are assumed Very High Fire Hazard Severity Zone sites.

Figure 3.7-1: LMR Project Sites in Very High Fire Hazard Severity Zones



3.7.2 Regulatory Setting

3.7.2.1 *Federal Regulatory Setting*

Comprehensive Environmental Response, Compensation, and Liability Act (Superfund) of 1980

CERCLA (42 U.S.C. Section 9601 et seq.), and all subsequent amendments provide a federal Superfund to clean up uncontrolled or abandoned hazardous-waste sites, including those affected by unauthorized releases of pollutants and contaminants. CERCLA grants the USEPA authority to assign responsible parties to a contamination event and to seek remuneration for its restoration.

Superfund Amendments and Reauthorization Act of 1986

Among its requirements, the Superfund Amendments and Reauthorization Act (SARA) (42 U.S.C. Section 9601 et seq.) identifies requirements for planning, reporting, and notification concerning hazardous materials. USEPA maintains a database of sites that are included on the NPL (40 CFR Part 300) (USEPA 2012). The NPL is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the USEPA in determining which sites warrant further investigation and remediation. Sites are listed on the NPL upon completion of a Hazard Ranking System screening, followed by consideration of public comments on proposed listings.

Resource Conservation and Recovery Act

The Federal Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 239–282), which amended the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.), establishes a framework for the proper management of hazardous and nonhazardous solid waste. This Act, along with the Toxic Substances Control Act of 1976, enacted a program administered by USEPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle to grave” system of regulating hazardous wastes from their creation to disposal. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the HSWA. RCRA focuses on active and future facilities; it does not address abandoned or historical sites, which are managed under CERCLA.

Hazardous Materials Regulations

The federal hazardous materials regulations (49 CFR 171-180) identify the required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations applicable to the shipment and transportation of hazardous materials. Sections 5101-5127 regulate the transportation of hazardous materials through the Hazardous Materials Transportation Act (HMTA). Under the HMTA, the Department of Transportation has the responsibility for safe transit of hazardous materials.

Occupational Safety and Health Act

The Occupational Safety and Health Act was passed by Congress in 1970 and is the primary federal law that governs occupational health and safety in the workplace. In part, it governs hazards in a working

environment, such as exposure to toxic chemicals, excessive noise levels, mechanical dangers, heat or cold stress, or unsanitary conditions.

Clean Water Act

The Clean Water Act (33 U.S.C. Section 1251 et seq.) was enacted to restore and maintain the chemical, physical, and biological integrity of the nation's waters by regulating point and nonpoint pollution sources, providing assistance to publicly owned treatment works for the improvement of wastewater treatment, and maintaining the integrity of wetlands. This includes the creation of the National Pollutant Discharge Elimination System (NPDES), which requires states to establish discharge standards specific to water bodies and regulates storm water discharge from construction sites through the implementation of a storm water pollution prevention plan (SWPPP).

Spill Prevention, Control, and Countermeasure Rule

The federal Spill Prevention, Control, and Countermeasure Rule (40 CFR Part 112) was enacted to require response and cleanup after a spill occurs and prevent discharge of oil into navigable waters of the United States or adjoining shorelines. Facilities subject to the rule must prepare and implement a spill prevention, control and countermeasure (SPCC) plan.

Federal Aviation Regulation

The federal aviation regulation (14 CFR Part 77) establishes standards and notification requirement for objects that may affect navigable airspace. This regulation requires that the administrator of the FAA must be notified by any person or organization who intends to sponsor construction or alterations exceeding 200 feet above ground level, as well as construction of alternatives in close proximity to an airport that may exceed certain heights (determined by the ratio of height/distance). In addition, FAA Advisory Circular AC 70/7560-1K, Obstruction Marking and Lighting, outlines standards for marking and lighting structures that exceed an overall height of 200 feet above ground level to promote aviation safety (FAA 2015).

3.7.2.2 State Regulatory Setting

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne) (California Water Code Section 13000 et seq.) is a state law that provides a comprehensive water quality management system for the protection of California waters. Porter-Cologne designated the State Water Resources Control Board as the ultimate authority over state water rights and water quality policy and established nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local/regional level. The RWQCBs have the responsibility of granting NPDES permits for stormwater runoff from construction sites.

California Health and Safety Code Section 25501

California law defines a hazardous material as any material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a present or potential hazard to human health and safety or to the environment if released in the workplace or the environment (California Health and Safety Code Section 25501). A hazardous waste is defined as a discarded material of any form (i.e., solid, liquid, gas) that may pose a present or potential hazard to human health and safety or to the environment when improperly treated, stored, transported, disposed of, or otherwise managed (California Health and Safety Code Section 25117).

California Resource Conservation Recovery Act

California's RCRA (22 CCR Division 4.5) hazardous waste program is more stringent than the federal counterpart, and certain wastes that would not qualify as hazardous based on federal standards may still qualify as hazardous waste according to California standards (termed non-RCRA hazardous waste).

California Occupational Safety and Health Administration Enforcement Unit

The California Occupational Safety and Health Administration (Cal/OSHA) enforcement unit has jurisdiction over every employer and place of employment in California, which is necessary to adequately enforce and administer all occupational safety and health standards and regulations. This includes the requirement that Material Safety Data Sheets (MSDS) for hazardous materials be available.

California Occupational Safety and Health Administration (CCR Title 8)

The Department of Industrial Relations in the Labor and Workforce Development Agency has administered the Cal/OSHA program since 1973, when California's plan was submitted to Federal OSHA for approval. Cal/OSHA protects workers and the public from safety hazards through its occupational safety and health programs, and it provides consultative assistance to employers. Handling and storage of fuels, flammable materials, and common construction-related hazardous materials are governed by Cal/OSHA.

California State Aeronautics Act

The California State Aeronautic Act (PUC § 21001 et seq.) is intended to protect the public interest in aeronautics and aeronautical progress. Administered by the California Department of Transportation, Division of Aeronautics, Article 3.5, Airport Land Use Commissions, (PUC §§ 21670 – 21679.5) outlines the statutory requirements for Airport Land Use Commissions (ALUCs) including the preparation of an Airport Land Use Compatibility Plan (ALUCP). Airport land use compatibility focuses on ensuring that land development near airports does not constrain the safe and efficient operation of the airport or exposing people living or working nearby to unacceptable levels of noise or safety hazards.

3.7.2.3 Local Regulatory Setting

Airport Land Use Compatibility Plans

Los Angeles County has 15 public and public use airports that have airport land use plans, which were all reviewed as part of this analysis. The ALUCPs and related documents that are applicable to this analysis include only Brackett Field Airfield Land Use Compatibility Plan (adopted December 9, 2015), a portion of which envelops Site SDW. The Brackett Field ALUCP identifies policies in areas in the vicinity of the airport to minimize the potential for off-airport aircraft accidents or incidents that might be associated with an emergency landing. These policies consider risks both to people and property on the ground and to people on board the aircraft. The plan relies on land use planning contained within the plan and federal regulations identified at 14 CFR Part 77 (discussed above) to further reduce potential risks near Brackett Field.

Los Angeles County Health and Safety Code

In accordance with the California Health and Safety Code (Chapter 6.95), business concerns operating within the jurisdiction of the Los Angeles County Certified Unified Program Agency (CUPA) are required to obtain annually a unified program facility permit before handling hazardous materials (Los Angeles County Code of Ordinances, Chapter 12.64) or before operating an aboveground petroleum storage tank facility (Los Angeles County Code of Ordinances, Chapter 12.70).

San Bernardino County Code of Ordinances

Similar to Los Angeles County, in San Bernardino County no person or entity is allowed to own, operate, or allow the operation of any activity or facility subject to the CUPA permit program elements without first obtaining and paying the applicable fees for a permit (San Bernardino County Code of Ordinances, Chapter 6.23). The CUPA permit includes, but is not limited to, hazardous waste generators and hazardous waste on-site treatment; underground and aboveground storage tanks, and California accidental release prevention program, as described in greater detail in Title 2, Division 3, Chapter 7 of the Code of Ordinances.

3.7.3 Significance Criteria

The proposed Project would result in significant impact from hazards and hazardous materials if any of the following significance criteria are met:

- 1) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 2) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- 3) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- 4) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- 5) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- 6) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- 7) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- 8) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

3.7.4 Impact Analysis

3.7.4.1 **Proposed Project**

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impacts

Diesel fuel is the primary hazardous material at the site. During construction diesel fuel will be required on site for heavy equipment. A diesel generator has been included in the analysis to potentially be placed at each proposed Project site. The generator would be placed on the site during the construction phase, fueled, and tested. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can occur only with transporters who have received training and appropriate licensing.

Refueling of equipment on site will be done in accordance with approved Safety and Health Plans. BMPs described in Chapter 2 include instruction on how and where refueling on a Project site may occur, spill prevention practices, and what to do if an accidental spill were to occur.

Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Waste manifest would be required for the disposal of any hazardous waste generated on site that needs to be disposed of at an approved landfill. Accidental spills or releases associated with the on-site fuel storage tanks will be controlled through secondary containment, SPCC plans as required by federal law where applicable, and worker education. Emergency response plans will be in place.

Hazards would be less than significant with implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on site, BMPs

discussed in Chapter 2, and emergency response plan preparation and coordination. Project impacts on the public or the environment during construction would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Hazards for operations will be less than described under construction; however, transportation and storage of diesel fuel on site would occur. Hazards will be less than significant through implementation of BMPs discussed in Chapter 2, regulations and requirements addressing transport driver education, preparation of SPCC plans as required by federal law to contain spills or releases on site, and emergency response plan preparation and coordination. Project impacts on the public or the environment related to potential creation of significant hazards during operation of the proposed Project sites would be less than significant.

Mitigation Measures

No mitigation measures are required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impacts

This analysis assumes that a diesel fuel tank from 1,000 up to 1,500 gallons is integrated into the design of the backup generator for each of the Project sites. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks will meet nationally recognized standards. Secondary containment (construction of concrete pad with a berm to contain potential diesel fuel spill) will be in place. Diesel fuel tanks greater than 660-gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112. Construction of the proposed Project would not create or result in any reasonably foreseeable upset or accident conditions. Impacts associated with release of hazardous materials to the environment would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation impacts would be limited to refilling the on-site diesel generator periodically. Refueling would be done in accordance with BMPs discussed in Chapter 2. Operation of the Project would not create or

result in any reasonably foreseeable upset or accident conditions. Impacts associated with release of hazardous materials to the environment during operation are less than significant.

Mitigation Measures

No mitigation measures are required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Construction Impacts

As shown in **Error! Reference source not found.**, two proposed Project sites (LARICSHQ and PASPD01) are within 0.25 mile of a school. During construction, heavy equipment will be used to excavate foundations and erect towers. For proposed Project sites that will be collocated on existing towers, man-lifts and other support trucks will be used to transport equipment to the site. Fueling of the equipment may occur on site as described under HAZ-1. Construction impacts, including potential refueling of construction equipment on site, would be completed in accordance with BMPs described in Chapter 2. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel is the primary hazardous material at the site. In accordance with such regulations, the transport of hazardous materials and wastes can occur only with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. The contractor is required to comply with all applicable regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on site, and emergency response plan preparation, including coordination with schools with 0.25 mile of the Project site. Impacts associated with emissions or handling of hazardous materials during construction would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation impacts are similar to those described above under Construction Impacts; however, transportation and handling of diesel fuel would be limited to refilling the diesel generator on site periodically. Refueling would be done in accordance with BMPs discussed in Chapter 2. Operational impacts associated with emissions or handling of hazardous materials during operation would be less than significant.

Mitigation Measures

No mitigation measures are required.

HAZ-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impacts

Only Site PDC is located in an area identified as a hazardous material site. The site has an active investigation for a LUST. LMR equipment proposed for the site would be placed on existing structures at the facilities with minimal ground-disturbing activities. Construction at this facility may include placement of new equipment structure and/or trenching for utilities that will disturb the ground. If potential contamination is not appropriately located and characterized prior to disturbance, disposal of excavated soil could result in a significant impact and create a significant hazard to the public or the environment at Site PDC.

Mitigation Measures

The following measure is applicable to Site PDC.

HAZ MM 1 Prior to construction activity, the construction contractor must prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.

- Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities.
- If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required.
- If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety.
- If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered.
- The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed.

Impacts after Mitigation

With implementation of HAZ MM 1, the location of the LUST site and impacted soil and groundwater would be identified to ensure proper disposal. After implementation of HAZ MM 1, impacts resulting from disturbance would be less than significant on the public and the environment at Site PDC.

Operation Impacts

No impacts are associated with the operation of Site PDC. Once this site is constructed, any hazardous material impacts that may be present would have been avoided and/or covered in hard surface and would no longer pose any type of health hazard to facility workers. Operation of the facility does not include intrusive activities or use of groundwater. No impacts would occur from operations.

Mitigation Measures

No mitigation measures are required.

HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impacts

Site SDW is the only proposed Project site located within an approved ALUP or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. No other proposed Project sites are within an ALUP, and no impacts would occur to any site other than Site SDW.

Site SDW lies within Area E land use as defined in the ALUCP for Brackett Field. The approved ALUP indicates that structures more than 100 feet tall within the Area E land use need to be evaluated by the FAA using Form 7460-1, in compliance with 14 CFR Part 77 to determine if the structure creates an air navigation hazard for the field. If the structure creates a navigation hazard, this would be a significant impact.

Mitigation Measures

The following mitigation measure shall apply at Site SDW.

HAZ MM 2 Prior to issuance of building permits, the Contractor shall submit Form 7460–1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR Part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.”

The FAA regulates objects affecting navigable airspace according to 14 CFR Part 77. The federal and state Departments of Transportation also require the proponent to submit FAA Form 7460–1, Notice of Proposed Construction or Alteration. According to 14 CFR Part 77, notification allows the FAA to identify potential aeronautical hazards in

advance, thus preventing or minimizing any adverse impacts on the safe and efficient use of navigable airspace.

Per 14 CFR Part 77, notification requirements include sending one executed form set (four copies) of FAA Form 7460–1, Notice of Proposed Construction or Alteration, to the Manager, Air Traffic Division, of the FAA Regional Office having jurisdiction over the area within which the construction or alteration will be located. The notice required must be submitted at least 45 days before the earlier of the following dates: (1) the date the proposed construction or alteration is to begin, or (2) the date an application for a construction permit is to be filed.

Impacts after Mitigation

FAA must be notified in accordance with 14 CFR Part 77. Prior to start of construction, Form 7460-1 needs to be filed with the FAA. Filing of the form triggers the FAA to complete an aeronautical study and return a hazard determination. The proposed antenna structure, a proposed 180-foot-tall lattice structure, would need to be built in compliance with FAA’s hazard determination and associated conditions from the aeronautical study (e.g., obstruction lighting). Application of HAZ MM 2 would ensure that the proposed Project complies with all FAA regulations regarding structures located within proximity to airports. After application of HAZ MM 2, impacts would be reduced to less than significant.

Operation Impacts

Operation of the proposed Project facilities would not result in impacts to aeronautical navigation. Pursuant to mitigation measure HAZ MM 2, the Contractor must receive a “Determination of No Hazard to Air Navigation” from the FAA prior to construction of Site SDW. Compliance with mitigation measure HAZ MM 2 and all current FCC and FAA regulations will ensure that the facility would not pose a risk to people living or working in the Project area. Operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

HAZ-6: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impacts

No proposed Project sites were identified within 2 miles of a private airstrip. No safety hazards would occur for people residing or working in the Project area. No impacts would occur from construction at any proposed Project site.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

No proposed Project sites were identified within 2 miles of a private airstrip. No safety hazards would occur for people residing or working in the Project area. No impacts would occur from operations at any proposed Project site.

Mitigation Measures

No mitigation measures are required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impacts

No proposed Project facilities would be built that would interfere with an adopted emergency response plan or emergency evacuation plan. The locations of proposed Project facilities have been fully coordinated with city and county emergency responders to ensure the location would not interfere with emergency response vehicles or facilities. LMR radio frequencies are assigned by the FCC based on availability to ensure that frequencies do not get duplicated or interfere with previously assigned channels. The LMR system is being integrated with participating agencies to enhance communication among emergency responders. The intent of the proposed Project is to enhance communication among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans and would result in beneficial operational impacts.

Construction activities at proposed Project sites where a new monopole or new tower is being constructed are fully coordinated with property owners where the proposed structure is to be placed. Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications. As no impairment of or interference with an emergency response plan or emergency evacuation plan would occur from construction, no impact would occur.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

No proposed Project facilities would be built that would interfere with an adopted emergency response plan or emergency evacuation plan. Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans and would result in beneficial operational impacts. No impairment of or physical interference with an

adopted emergency response plan would occur; therefore, no impacts associated with these criteria would occur.

Mitigation Measures

No mitigation measures are required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impacts

Forty-seven proposed Project sites are either located or, in the case of sites on federal land, presumed within a Very High Fire Hazard Severity Zone (**Error! Reference source not found.**). Construction in these zones will comply with local municipal code, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. Construction activities in these areas represent an elevated risk of igniting a wildland fire.

California PRC Sections 4201-4204 and Government Code Sections 51175-51189 require identification of fire hazard severity zones within the State of California and specify standards for brush clearance around buildings or structures located in, upon, or adjoining any mountainous, forest, brush, or grassland area. Fire hazard severity zones are measured qualitatively, based on vegetation, topography, weather, crown fire potential (a fire's tendency to burn upwards into trees and tall brush), and ember production and movement within the area in question.

All proposed Project sites within wildland areas are in previously disturbed, well-cleared areas. Seven sites (sites ASD, LACF072, LARICSHQ, PASDPD01, PDC, SGH, and WS1) are not in areas identified as a Very High Fire Hazard Severity Zone and do not pose an elevated risk of wildland fire ignition. Impacts from construction at these sites are less than significant. Construction at the 48 sites listed in **Error! Reference source not found.**, because they are located or assumed located within a very high fire hazard zone, pose an elevated risk of wildland fire ignition; and these risks are considered a significant impact.

Mitigation Measures

No mitigation measures are required at sites ASD, LACF072, LARICSHQ, PASDPD01, PDC, SGH, or WS1. Implementation of HAZ MM 3 would be required at the 48 sites listed in **Error! Reference source not found.**

HAZ MM 3 Fire Management Plan. Prior to construction activity, the Authority must work with the agency responsible for fire protection in the jurisdiction where the site is located to develop and implement a fire management plan for use during construction activity. The plan will identify project locations, project descriptions, anticipated construction activities, limitation of activities during periods of elevated fire risk (e.g., "red flag")

days), level of suppression equipment required on site, training requirements, and points of contact.

Impacts after Mitigation

The training aspects of HAZ MM 3 would reduce potential for ignition of wildland fires, since awareness of fire safety would be elevated, and would preclude careless activities such as smoking in non-approved areas, construction activities during non-approved activity periods, etc. Additionally, the chances of an ignited fire spreading would be limited by worker training and availability of suppression tools and water. As a result, construction impacts related to wildland fire would be reduced to less than significant for the 48 sites identified within a Very High Hazard Severity Zone after implementation of HAZ MM 3, Preparation of Fire Management Plan.

Operation Impacts

Proposed Project facilities would be unmanned, equipment would be maintained within a shelter, and the diesel generator would be operated only during a power outage and periodically for routine maintenance. The risk of starting a fire from operational activities would be minimal. Operation of the proposed Project at all sites would have a less than significant impact.

Mitigation Measures

No mitigation measures are required.

3.7.4.2 No Project Alternative

Under the No Project Alternative, construction and operation of the proposed Project sites would not occur. Potential hazards associated with routine transport or potential upset and disposal of hazardous materials or potential hazardous emissions within 0.25 mile of a school would not occur. Proposed Project sites listed pursuant to Government Code Section 65962.5 would not be disturbed. No change in safety hazards would occur in association with construction or operation of proposed Project sites within 2 miles of public or private airports or related to construction and operation of Project sites within wildland or wildland interfaces, and no impacts would occur to emergency plans. Additionally, without implementation of the proposed Project, fewer areas within Los Angeles County would benefit from improved communication during emergency responses, major incidents, or natural disasters.

3.7.5 Cumulative Impacts

3.7.5.1 Geographic Extent

The effects of the proposed Project on hazards and hazardous materials are dependent on the hazard considered. For purposes of the cumulative analysis the following geographic areas for each impact analysis were considered:

- HAZ-1. Because release of any hazardous substances would be confined to the individual proposed Project site, the area potentially impacted by the proposed Project is limited to the

site boundary along with undefined routes associated with transport of diesel fuel to and from each site to service the emergency generators. The cumulative impacts analysis includes the proposed Project site. This analysis also includes a generalized discussion regarding transportation of hazardous materials from sites. Because hazardous materials could be generated, transported, or disposed from any proposed Project site, all sites are included in the analysis.

- HAZ-2. The potential for impact from the proposed Project is limited to the site boundary for the reasons described under Impact HAZ-1; the geography for the cumulative impacts analysis includes activities contained within the proposed Project site boundary. Because hazardous materials could potentially be released from any proposed Project site, all sites are included in the analysis.
- HAZ-3. The potential for impact would occur at sites within 0.25 mile of a school. Only two proposed Project sites, LARICSHQ and PASPD01, were within 0.25 mile of a school. Based on this, a separate 0.25-mile boundary was drawn around the two schools in proximity to these sites (East Los Angeles Academy and the University of Phoenix Pasadena campus, respectively). These two areas were used for consideration of cumulative impacts.
- HAZ-4. The threshold relates to the Project site only; therefore, the cumulative impacts review is limited to the site boundary. Only one site (Site PDC) coincides with occurrence of a site listed pursuant to Government Code Section 65962.5. The cumulative impacts analysis includes the area within the boundary of Site PDC.
- HAZ-5. This threshold considers the Project area only. Only one site (Site SDW) was identified as being within an ALUP of a public or public use airport, and no sites were identified as being within 2 miles of a public airport or public use airport. As a result, the geography reviewed for cumulative effects is the area immediately surrounding Site SDW.
- HAZ-6. No private airstrips were identified within the vicinity of any proposed Project site. No geographic extent was identified. As no impacts were identified, no cumulative impacts associated with the proposed Project would occur. No additional cumulative impact analysis is warranted.
- HAZ-7. No impacts were identified that would result in impairment of or interference with an emergency response plan or emergency evacuation plan. No geographic extent was identified. Since no impacts were identified, no cumulative impacts associated with the proposed Project would occur.
- HAZ-8. The impact analysis conducted compares against a landscape level baseline (i.e., very high and assumed very high severity zones throughout the proposed Project area). Analysis is at the regional level.

3.7.5.2 Existing Cumulative Conditions

Regarding the analysis for Impacts HAZ-1 through HAZ-4, the Project area contains urban, rural, and remote areas and includes a wide variety of land use patterns. Past activities may have resulted in release of hazardous substances. The primary hazardous substance planned for use during construction or operations at each site would be diesel fuel, which would be used to power on-site diesel equipment during construction and run the emergency backup diesel generator planned for each site during operations. Diesel would be transported to the site in accordance with applicable regulations.

Impacts HAZ 5 and HAZ 6 consider airports (public and public use) and private airstrips. Construction within the ALUCP of Brackett Field (near Site SDW) is under the purview of the Los Angeles County Airport Commission. The ALUCP was developed to regulate land uses and encompasses a study area extending nearly 5 miles from the airfield. The ALUCP includes a requirement that new development be coordinated through the land use commission and that tall structures be further evaluated pursuant to FAA regulations found at 14 CFR Part 77. No private airstrips were identified in the vicinity of any proposed Project site.

No construction or operations impacts that would impair or interfere with an emergency response plan or emergency evacuation plan were identified associated with construction or operations at any proposed Project site. No cumulative impacts would occur.

Regarding wildland fire potential (HAZ-8), each of the 54 proposed Project sites includes some potential to ignite a wildland fire; and at 48 sites that fall into or are assumed in a Very High Fire Hazard Severity Zone, this risk is considered elevated enough to warrant mitigation in the form of development and implementation of a Fire Management Plan for the proposed Project. Over 700 additional projects were identified within 2 miles of the 54 proposed Project sites, and over 500 additional projects were within 2 miles of the 48 sites rated as very high severity. Modern wildland fires are often severe and can spread over areas that exceed 2 linear miles. As an example, the 2009 Station Fire, located largely on the Angeles National Forest, burned over 250 square miles. Also included in the consideration of risk potential for fires are weather, topography, fuel loading, fuel moisture, and personnel and equipment availability to suppress fire. Human factors include fire cause, which can include accidental causes and arson, which was determined as the cause of the Station Fire (USDA Forest Service 2015).

3.7.5.3 Cumulative Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Many industrial sites may have experienced release of hazardous materials from leaking underground storage tanks, landfills, or simply through past practices that were best practices in their time. The potential for future releases, including releases from proposed Project activities, is considered far less than past activities, due to the regulatory environment and current practices that exist to prevent release of hazardous materials to the environment. Project activities that could potentially result in release of hazardous materials would be contained to the site, with the exception that diesel fuel would

occasionally be delivered to each site to service the emergency backup generators placed at each site. All projects, including the proposed Project, are required to comply with applicable federal and state regulations to ensure that hazardous materials are transported, used, and disposed properly. While accidental spills could occur, spill prevention plans required by federal law would include requirements for containment and remediation of any released contaminant. Because containment would occur quickly, the chance of an on-site or in-transport spill resulting in a cumulatively significant hazard when combined with other past or future spills is not high. Because it is assumed that all projects would be conducted in accordance with applicable regulations, the potential for cumulative impacts associated with release of contaminants creating a significant hazard to the public is less than significant.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

As discussed under Impact HAZ-1, proposed Project activities that could potentially result in release of hazardous materials would be contained to the site, with the exception that diesel fuel would occasionally be delivered to each site to service the emergency backup generators placed at each site. All projects, including the proposed Project, are required to comply with applicable federal and state regulations to ensure that hazardous materials are transported, used and disposed properly. While accidental spills could occur, spill prevention plans required by federal law would include requirements for containment and remediation of any released contaminant. Because containment would occur quickly, the chance of an on-site or in-transport spill resulting in a cumulatively significant hazard when combined with other past or future spills is not high. Because it is assumed that all projects would be conducted in accordance with applicable regulations, the potential for cumulative impacts associated with release of contaminants creating a significant hazard to the public is less than significant.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Only two proposed Project sites (sites LARICSHQ and PASPD01) were identified within 0.25 mile of a school, each with one school identified. The project list consulted in Table 2.7-1 encompassed the entire project area around each of the schools.

The East Los Angeles County Community School located on Monterey Pass Road in Monterey Park is within 0.25 mile of Site LARICSHQ. No additional projects were identified that were within 0.25 mile of this school. No cumulative impacts would occur.

The University of Phoenix Pasadena Learning Center on North Euclid Avenue in Pasadena is within 0.25 mile of Site PASPD01. The 0.25-mile search of Table 2.7-1 from University of Phoenix revealed two projects that lie within the area of analysis. These include the existing LA-RICS Long Term Evolution Site PASD001, located on a parking structure near Pasadena City Hall, and new apartment construction at 262 Los Robles Avenue in Pasadena. LTE Site PASD001 would likely require servicing that includes occasional replenishment of diesel fuel associated with its emergency backup generator. No long-term

use of hazardous materials is expected from new apartment buildings. It is assumed that all hazardous materials would be managed in accordance with applicable regulations; and, therefore, any releases would be immediately and closely contained. Therefore, no cumulative impact associated with release of hazardous substances near this school is anticipated.

HAZ-4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Only Site PDC was included in this analysis, because it is the only proposed Project site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. One project from Table 2.7-1 was also identified within the site boundary of Site PDC: the LA-RICS LTE Site WHD, which is considered in this analysis.

As discussed under Impact HAZ-1, proposed Project activities that could potentially result in release of hazardous materials would be confined to the site, with the exception that diesel fuel would occasionally be delivered to each site to service the emergency backup generators placed at each site. All projects, including the proposed Project, are required to comply with applicable federal and state regulations to ensure that hazardous materials are transported, used, and disposed properly. While accidental spills could occur, spill prevention plans required by federal law would include requirements for containment and remediation of any released contaminant. Because containment would occur quickly, the chance of an on-site or in-transport spill resulting in a cumulatively significant hazard when combined with other past or future spills is not high. Because it is assumed that all projects would be conducted in accordance with applicable regulations, the potential for cumulative impacts associated with release of contaminants creating a significant hazard to the public is less than significant.

HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Only Site SDW occurs within the geography identified for analysis of this threshold. No other projects were identified immediately adjacent to Site SDW, the closest project being a subdivision of two-story residences, and the nearest tall structures nearly 2 miles distant. No cumulative impacts have been identified that would result in a safety hazard for people residing or working in the Project area.

HAZ-6: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No private airstrips were identified within the vicinity of any proposed Project site. No cumulative impacts would occur.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No impacts were identified that would impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. No cumulative impacts would occur.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Based on past wildfire activity in southern California, the potential for wildland fire represents a significant risk of loss, injury, and death. This risk becomes elevated in wildland areas and in the urban interface where urbanized areas are intermixed with wildlands. The risk associated with wildland fire in southern California is significant.

Impacts associated with the proposed Project were identified as less than significant at 7 urban sites, and significant but reduced to less than significant at 48 sites with elevated fire risk that require implementation of HAZ MM 3. Because the project sites are generally maintained to prevent fuel buildup adjacent to the sites, conditions conducive to the spread of wildfire are generally fairly low. Because the measures required in the Fire Management Plan would help both to prevent fire ignition and to quickly suppress any fire that was ignited, the chance of fire igniting and spreading from proposed Project sites as a result of project implementation is considered substantially reduced. As a result, the proposed Project would be considered not to add a cumulatively considerable impact to wildland fire risk.

3.8 Hydrology/Water Quality

3.8.1 Environmental Setting

Water resources refer to the occurrence, availability, and physical, chemical, and biological characteristics of surface water and groundwater, including hydrologic properties and water quality for aquatic plant and animal communities and public water supplies. Waterbodies include aquifers, springs, streams, rivers, lakes, reservoirs, estuaries, and nearshore and offshore marine waters. Water quality encompasses the level of pollutants that affect the suitability of water for a given use. Water use classifications generally include public water supply, recreation, propagation of fish and other aquatic life, agricultural use, and industrial use.

3.8.1.1 *Surface Waters*

Los Angeles County occupies approximately 4,083 square miles. Elevations range from sea level to 10,064 feet amsl at the summit of Mount San Antonio. Los Angeles County is approximately 25 percent mountains; 10 percent coastal plain; and 65 percent foothills, valley, and desert. Most mountains are lower than 5,000 feet amsl with only 210 square miles (5 percent) above this elevation. Surface water in streams is derived principally from precipitation, runoff, and, in some cases, groundwater (LACDRP 2015).

Average annual precipitation in Los Angeles County ranges from approximately 4.5 inches in the coastal plain to 35 inches in mountainous areas. Average annual precipitation in portions of the Mojave Desert area in north Los Angeles County is as low as 2.5 inches. Rainfall intensity in southern California can range from 0.1 inch per day to more than an inch per hour. Snowfall at elevations above 5,000 feet frequently occurs during winter storms but melts rapidly except on the higher peaks and north-facing slopes. Most precipitation occurs between December and March. Dry periods of several months are common (LACDPW 2006).

One proposed Project site in San Bernardino County is located within or near the City of Chino Hills, where average annual precipitation is approximately 21 inches. Most precipitation falls between December and March.

Runoff characteristics are influenced by soil type, terrain, vegetation, and other conditions. Precipitation during periods of low soil moisture is almost entirely absorbed by porous soils. Substantial surface runoff occurs after soil moisture is near field capacity and during extreme intense rainfall events. Because much of the coastal plain is urbanized, natural soil and vegetation have been replaced by impervious surfaces. In urban areas, stormwater runoff is directed to storm drains and lined channels with little opportunity for natural infiltration to groundwater aquifers (LACDPW 2006).

Piru Creek in western Los Angeles County is the only Wild and Scenic River identified, and it is in a separate watershed more than 5 miles from the nearest Project site, Site LACFDEL (National Wild and Scenic Rivers System 2015).

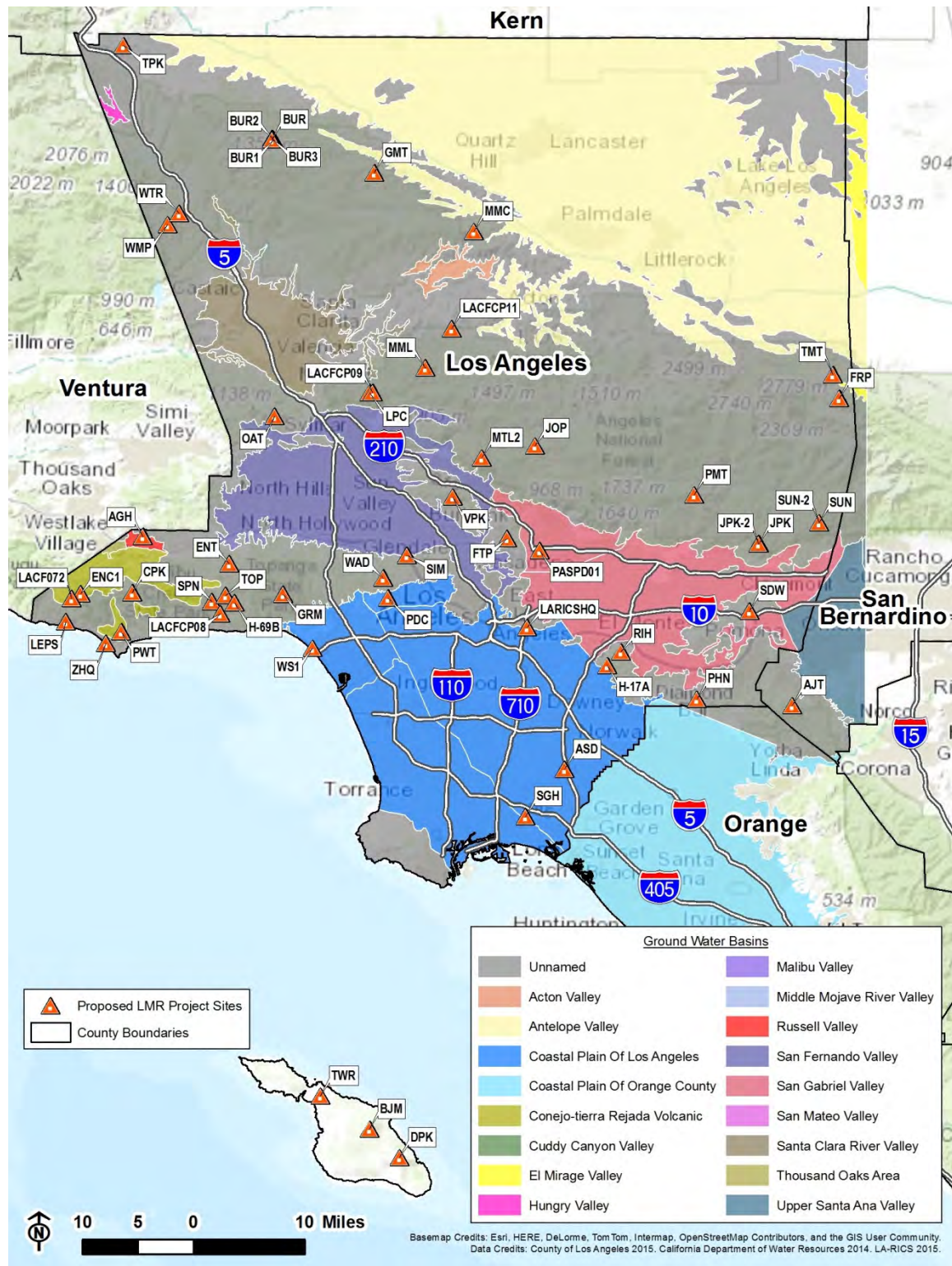
3.8.1.2 Groundwater Aquifers

Most groundwater production is concentrated in populated areas, particularly in southern Los Angeles County and Orange County. Published information regarding the depth of groundwater and other aquifer parameters is scarce or unavailable in sparsely populated areas or where groundwater resources have not been used extensively. Descriptions of aquifers and number of proposed Project sites within specific groundwater basins are provided in Table 3.8-1. Proposed Project sites and groundwater aquifers are shown in Figure 3.8-1. Groundwater basins in which each Project site is located are identified in Chapter 4.

Table 3.8-1: Proposed Project Site Distribution by Groundwater Basin

Groundwater Basin	Description	Proposed Project Sites
Coastal Plain of Los Angeles	Aquifers in this basin are composed of unconsolidated alluvial sediments. Aquifer thickness typically ranges from 30 to 500 feet, and groundwater elevations typically range from approximately 110 to 230 feet below mean sea level due to extensive overdraft. Perched groundwater or non-producing aquifers may occur at shallow depths of 20 feet or more.	5
San Gabriel Valley	Aquifers in this basin are composed of unconsolidated alluvial sediments. Aquifer thickness typically ranges from approximately 300 to more than 3,000 feet, and groundwater elevations typically range from 110 to 1,200 amsl.	1
Conejo-Tierra Rejada Volcanic	Aquifers in this basin are composed of unconsolidated alluvial sediments and sedimentary and volcanic rocks of the Modelo, Topanga, and Conejo Formations. Alluvium is generally only a few feet thick and is not a significant source of groundwater. The sedimentary and volcanic rocks are the primary sources of groundwater and have a combined thickness up to approximately 19,500 feet.	3
Russell Valley	Aquifers in this basin are composed of Holocene-age alluvium, although some groundwater is extracted from underlying volcanic rocks and older Tertiary sedimentary rocks. Holocene-age alluvium consists of unconsolidated, poorly bedded, poorly sorted to sorted sand, gravel, silt, and clay with some cobbles and boulders that average about 35 to 55 feet thick.	1
Unnamed	Isolated aquifers in these mountainous and hilly areas may occur in unconsolidated alluvial sediments at the base of valleys and in porous or fractured bedrock.	41
None-Catalina Island	No aquifers were identified on Catalina Island	3
TOTAL		54
Source: http://www.water.ca.gov/groundwater/bulletin118.cfm		

Figure 3.8-1: Groundwater Aquifers in the Proposed Project Area



3.8.1.3 Floodplains

Floodplains provide many valuable benefits to the natural and human environment, including flood protection, floodwater storage, groundwater recharge, and habitat for flora and fauna. On the other hand, when floodwaters reach certain levels, they can inundate areas of human activity, causing death and injury and damage to structures.

“Flood Zone X” includes areas determined to be outside the 500-year floodplain or sites subject to inundation by a 500-year flood; areas of 100-year flood with average depths of less than 1 foot, or where contributing drainage area is less than 1 square mile, or areas protected by levees from the 100-year flood. “Flood Zone X” includes 17 proposed Project sites; and 36 sites are designated within “Flood Zone D,” classified as areas of undetermined, but possible flood hazards. One site is designated within “Flood Zone AE,” defined as a special flood hazard area with base flood elevations determined (FEMA 2015).

Table 3.8-2: Project Sites in Designated Flood Zones

Flood Zone X	Flood Zone D	Flood Zone AE
AGH, AJT, ASD, CPK, ENC1, LACF072, LARICSHQ, LEPS, PASPD01, PDC, PHN, PWT, SGH, SIM, TPK, WAD, WS1	BJM, BUR, BUR1, BUR2, BUR3, DPK, ENT, FRP, FTP, GMT, GRM, H-17A, H-69B, JOP, JPK, JPK2, LACFCP08, LACFCP09, LACFCP11, LPC, MMC, MML, MTL2, OAT, PMT, RIH, SDW, SPN, SUN, SUN2, TMT, TOP, TWR, VPK, WMP, WTR	ZHQ
Source: http://fema.maps.arcgis.com/home/webmap/viewer.html , July 2015		

3.8.2 Regulatory Setting

3.8.2.1 Federal Regulatory Setting

U.S. Army Corps of Engineers

Clean Water Act

Sections 303, 401, 402 and 404 of the Federal Water Pollution Control Act of 1972 (33 U.S.C. 1251 et seq.), more commonly known as the Clean Water Act (CWA), protect the water quality of jurisdictional surface waters. The CWA requires states to: (1) protect specific beneficial uses of surface water and groundwater; (2) comply with applicable effluent limitations; (3) implement BMPs to eliminate or reduce discharges of pollutants; and (4) regulate the discharge of dredged or fill material into streams, rivers, wetlands, non-wetland, and other surface waters.

Federal Land Management Agencies (USFS and NPS)

Wild and Scenic Rivers Act

The Wild and Scenic Rivers Act of 1968 (16 U.S.C. 1271-1287) established the National Wild and Scenic Rivers System aimed at preserving and protecting wild and scenic rivers in a free-flowing condition for the benefit and enjoyment of present and future generations.

Federal Emergency Management Agency

Executive Order 11988

The National Flood Insurance Program (NFIP) of 1968 provides flood insurance to homeowners, renters, and business owners if their community participates in the NFIP. Participating communities agree to adopt and enforce ordinances that meet or exceed Federal Emergency Management Agency (FEMA) requirements to reduce flooding risks to properties that may be located in floodplains (FEMA 2015; Federal Register 1977). The federal government will then make flood insurance available within the community as a financial protection against flood losses.

3.8.2.2 State Regulatory Setting

California State Water Resources Control Board

The Porter-Cologne Water Quality Control Act (Division 7 of the California Water Code) establishes a regulatory program to augment federal protections under the CWA to protect “waters of the State,” which include surface, ground, and ocean water. In California, the National Pollutant Discharge Elimination System (NPDES) permitting program is administered by the State Water Resources Control Board under the umbrella of the Porter-Cologne Act. NPDES permits are required for dewatering activities and are issued by Regional Water Quality Control Boards (RWQCBs). They set forth effluent limitations, monitoring, and reporting obligations and often require BMPs to preclude impacts to groundwater.

California Department of Fish and Wildlife

Section 1601 et seq. of the California Fish and Game Code (CFGC) authorizes the California Department of Fish and Wildlife (CDFW) to enter into a “Lake or Streambed Alteration Agreement” with project proponents to minimize or avoid impacts to a river, stream, or lake where fish or wildlife resources may be adversely affected (CDFW 2015c).

3.8.2.3 Local Regulatory Setting

Los Angeles County

The Los Angeles County Department of Public Works (LACDPW) Stormwater and Runoff Pollution Control Program tracks industrial and commercial businesses in the unincorporated county area to determine compliance with the provisions of the Municipal NPDES Permit issued by the Los Angeles

RWQCB. The Stormwater and Runoff Pollution Control Ordinance of the County of Los Angeles (Title 12, Chapter 12.80) is intended to protect the health and safety of county residents by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the county from pollutants carried by stormwater and non-stormwater discharges.

Chapter 21 of the Flood Control District Code regulates the stormwater and non-stormwater discharges to the facilities of the Los Angeles County Flood Control District for the protection of those facilities, the water quality of the waters in and downstream of those facilities and the quality of the water that is being stored in water-bearing zones underground. Among its requirements, the ordinance prohibits discharge of contaminated stormwater at concentrations that exceed water quality standards and non-stormwater discharges unless authorized by an NPDES permit (LACDPW 2015)

San Bernardino County

Prior to construction, project proponents are to prepare a Water Quality Management Plan and Stormwater Best Management Practices Transfer, Access and Maintenance Agreement (SBDPW 2015).The NPDES permit process addresses the San Bernardino Department of Public Work's environmental needs regarding stormwater quality issues for San Bernardino County.

3.8.3 Significance Criteria

The proposed Project would result in significant impact to hydrology and water quality if any of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met:

- 1) Would the project violate any water quality standards or waste discharge requirements?
- 2) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- 3) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?
- 4) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?
- 5) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- 6) Would the project otherwise substantially degrade water quality?
- 7) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

- 8) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?
- 9) Would the project expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?

Based on the Initial Study for the proposed Project (See Appendix A), it was determined that because the proposed Project would not result in construction of housing within a 100-year floodplain, no further analysis of this topic is warranted within this EIR.

3.8.4 Impact Analysis

3.8.4.1 Proposed Project

WQ-1: Would the project violate any water quality standards or waste discharge requirements?

Construction Impacts

Proposed roof mount or collocation sites would have minimal excavation, primarily trenching associated with placement of utility hookups or grading for placement of an equipment shelter. Water may be used to wet soils for compaction and to control dust. Any surface water runoff that could affect water quality will be controlled by required BMPs as described in Chapter 2. BMPs include placement of various measures such as use of berms and drainage ditches to divert runoff around exposed areas and control stormwater flowing to and through the Project site, and protection of stormwater inlets from sediment through placement of hay bales, sand bags, and fiber rolls. There would be no violation of any water quality standard or waste discharge requirements and no impact under this threshold as it relates to the proposed construction of roof mount and collocations sites.

Sites proposed for new monopoles or towers would require deeper excavation than proposed collocation or roof mount sites. Any potential for surface water runoff to affect water quality will be controlled by required BMPs, as described in Chapter 2. BMPs are intended to reduce run-on and runoff of stormwater, control sediment runoff through placement of hay bales, sand bags, and fiber rolls that protect stormwater or drainage inlets. At these sites groundwater may also be encountered during excavation of deep foundations. The quantity of groundwater that may be encountered is not currently known and would depend on the depth to groundwater, the rate of groundwater flow through the aquifer, the extent of the excavation, and other factors. Following geotechnical investigation, the likelihood of encountering groundwater would be calculated; and, if necessary, a dewatering plan would be prepared. For sites where groundwater is likely to be encountered during excavation, a permit from the local RWQCB would be obtained prior to construction in case dewatering is necessary. Removal or discharge of water would be done in accordance with the terms and conditions contained in the permit.

Dewatering of an excavation would constitute a significant impact if the water is not discharged properly. The Authority will comply with all terms and conditions specified in the applicable permit. Because construction of the proposed Project would be conducted in accordance with applicable NPDES

permit requirements, no violation of water quality standards would occur; and no impact would occur under this threshold as it relates to the proposed construction of new monopole or lattice tower sites.

Mitigation Measures

In the event that groundwater is encountered that requires dewatering, application of UTL MM 1 is required.

Impact after Mitigation

The permitting process is designed to evaluate and ensure groundwater discharges do not affect water quality. The Authority will comply with all conditions and stipulations specified in the applicable permit. Because construction of the Project would be conducted in accordance with applicable stipulations and conditions in the applicable NPDES permit, no violation of water quality standards or waste discharge requirements would occur. Impacts associated with dewatering would be reduced to less than significant, the effect of the mitigation would be to eliminate impact (i.e., no impact).

Operation Impacts

Operation of any proposed Project facility would not require use of or discharge of water from the proposed facility. BMPs require that soils be stabilized once construction is completed, and operational activities would not generate runoff that could affect water quality or generate water discharge. Operation of the proposed Project would occur in compliance with applicable regulations, would not use or discharge measurable amounts of runoff, and no violation of water quality standards or waste discharge requirements would occur. There would be no impacts under this threshold.

Mitigation Measures

No mitigation measures are required.

WQ-2: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impacts

Water use during construction would be associated with compaction of soils and wetting of exposed soils during construction to control dust.

Water use is not expected to exceed 500 gallons during the entire six-week construction period at any site. In comparison, a typical household in Los Angeles County uses approximately 250 to 360 gallons of water every day. No new groundwater sources are required to support the proposed Project, and the water supplied to the Project would be acquired from municipal or other public water sources. Only a portion of the up to 27,000 gallons of water used for the 54 sites in the proposed Project to support

construction would likely come from groundwater sources, and usage would be spread over the entire region. Impacts to groundwater supplies would be less than significant.

Groundwater recharge could potentially be affected by creation of new impervious surfaces. This impact would be greatly limited for several reasons. First, the amount of new impervious surfaces at any site is limited to only up to 4,000 square feet at any site (and less at roof mount and collocation sites). Roof mount sites are generally located in urban areas; and only small, new, impermeable surfaces would be created. Roof mount sites are generally urbanized and not located in groundwater recharge areas, and impact to groundwater recharge would be less than significant.

Collocation sites may or may not be in urban areas; very little impermeable surface would be added. Non-urban collocation sites are generally along ridgelines or on or near hilltops. Groundwater recharge areas are in low-lying areas and associated with drainages and basins. Therefore, the proposed roof mount and collocation sites would not result in depletion of groundwater supplies or interfere with groundwater recharge. New monopoles or new towers are located along ridgelines, near or on hilltops, or in urban areas. Ridgelines and hilltops are not groundwater recharge areas, as explained above. No new monopoles and towers located in urban areas would be located in groundwater recharge areas. New monopoles/towers in urban areas would be located at facilities with existing large, paved impervious surfaces. Therefore, construction of the proposed Project would not result in interference with groundwater recharge; and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

No water would be needed for the operation of the proposed Project, although maintenance activities could result in some minor domestic water uses at some sites. Operation of the proposed Project would not result in depletion of groundwater supplies or interfere with groundwater recharge; and operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

WQ-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?

Construction Impacts

None of the construction at proposed Project sites would substantially alter existing drainage patterns. None of the sites include a proposed concrete pad or access road that would cross drainage; and all proposed sites are in previously disturbed areas along ridgelines or in urban areas with already-existing impervious surfaces. Site design will direct drainage toward storm drains, or antennas will be collocated

to an existing structure or rooftop with minimal or no ground disturbance. All construction plans will be reviewed by applicable local or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas, which is a standard part of the review process prior to issuance of a building permit. All plans will be reviewed to ensure existing storm drain systems can support any additional runoff. During the design and building permit approval process, a hydrological analysis will be completed for each proposed Project site, and/or a standard approved equipment and generator pad will be developed. Depending on the results of the analysis, the design may include standard down drains and energy dissipaters as required to minimize potential for erosion. BMPs, as described in Chapter 2, such as hay bales, straw rolls, or similar methods will be implemented to direct runoff toward drains and limit sediment leaving the area during construction to limit erosion of exposed soils (e.g., during excavation). Therefore, construction of the proposed Project will not result in substantial erosion/siltation, and no impact is anticipated.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation of the facilities on site would not disrupt or alter drainage patterns. Hydrological analysis of surfaces that could generate runoff would be completed during the design and building permit approval process to ensure that local drainages and storm drain system can support any additional runoff that may occur as part of the proposed Project. Therefore, operation of the proposed Project will not result in substantial erosion/siltation, and no impact is expected.

Mitigation Measures

No mitigation measures are required.

WQ-4: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Construction Impacts

None of the construction at proposed Project sites would alter (i.e., fill in or change the course of) a stream or river. All construction plans will be reviewed by applicable local or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. All plans will be reviewed to ensure existing storm drain systems can support additional runoff. During the design and building permit approval process, a hydrological analysis will be completed for each proposed Project site; and/or a standard approved equipment and generator pad will be developed. Depending on the results of the analysis, the design may include standard down drains and energy dissipaters, as required, to minimize potential for erosion. The Project facilities proposed on ridgelines or hilltops are being

constructed in previously disturbed areas. The overall existing pads and disturbed area will be minimally expanded or altered at these sites. During construction, BMPs, such as sandbags, hay bales, silt fences, and placing berms around the construction areas, as described in Chapter 2, shall be in place to direct runoff to storm drains and/or natural drainage features. The building permit process reviews drainage issues for each site to assess the amount of runoff that would be generated and whether local drainage systems (natural or man-made) can support any additional runoff that may be generated by the Project. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. All plans will be reviewed to ensure existing storm drain systems can support additional runoff. Therefore, construction of the Project would not substantially increase the rate or amount of surface runoff or result in flooding on or off site, and no impacts would be associated with this threshold.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

All construction plans will be reviewed by applicable local or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. All plans will be reviewed to ensure existing storm drain systems can support additional runoff. The design may require permanent treatment with BMPs to minimize potential for erosion. The Project facilities proposed on ridgelines or hilltops would be constructed in previously disturbed areas. The overall existing pads and disturbed area would be minimally expanded or altered at these sites. The building permit process reviews drainage issues for each site to assess the amount of runoff that would be generated and whether local drainage systems (natural or man-made) can support any additional runoff that may be generated by the Project.

For Project facilities proposed in urban areas, construction would generally occur within areas that have impervious material and where drainage is directed toward the local storm drain system. Operation of the facilities would not generate any water, and addition of impervious surfaces would be minimal. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. All plans will be reviewed to ensure existing storm drain systems can support additional runoff. Therefore, operation of the Project will not increase the rate or amount of surface runoff or result in flooding on or off site, and no impacts would be associated with this threshold.

Mitigation Measures

No mitigation measures are required.

WQ-5: Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impacts

As discussed for WQ-3 and WQ-4 all construction plans would be reviewed by applicable local or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. All plans will be reviewed to ensure existing storm drain systems can support additional runoff. The design may include energy dissipaters for water outfall areas to minimize potential for erosion. The Project facilities proposed on ridgelines or hilltops are being constructed in previously disturbed areas. The overall existing pads and disturbed area will be minimally expanded or altered at these sites. The building permit process reviews drainage issues for each site to assess the amount of runoff that will be generated and whether local drainage systems (natural or man-made) can support any additional runoff that may be generated by the Project. For Project facilities located in urban areas, the proposed construction is generally within areas that have impervious material and where drainage is directed towards the local storm drain system. During construction, BMPs such as sandbags, hay bales, silt fences, and placing berms around construction areas shall be in place to direct runoff to storm drains and/or natural drainage features. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. Project runoff would not exceed the capacity of planned or existing drainage systems, and impacts would be less than significant.

Each proposed Project site may have a diesel fuel tank from 1,000 up to 1,500 gallons integrated into the design of the backup generator. The fuel tank is a potential water pollutant. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks will meet nationally recognized standards. Secondary containment (generators will be placed on a bermed pad) will be in place. Diesel fuel tanks greater than 660-gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112. Fuel tanks would be installed in accordance with prescribed regulations and would not provide a substantial additional source of polluted runoff, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Hydrological analysis of surfaces that would generate runoff will be completed during the design and building permit approval process to ensure that local drainages and storm drain system can support any additional runoff that may occur as part of the proposed Project. Fuel storage tanks will be maintained in good condition including required spill prevention measures, water pollution from the threat of a fuel

spill or leak is minimal. Therefore, operation of the Project will not exceed the capacity of existing drainage systems or substantially add to sources of polluted runoff, and no impact would occur.

Mitigation Measures

No mitigation measures are required.

WQ-6: Would the project otherwise substantially degrade water quality?

Construction Impacts

All construction plans will be reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage toward existing natural and/or storm drain catch areas. During construction, BMPs such as sandbags, hay bales, silt fences, and placing berms around construction areas, as described in Chapter 2, shall be in place to direct runoff to storm drains and/or natural drainage features. Silt fences, hay bales, or other types of geofabric specifically designed to reduce siltation will be required to be in place and inspected during construction to substantially reduce and/or eliminate siltation of runoff from the job site during construction. Use of water at the site during construction will be minimal and will be limited to the compaction of soils, concrete wash-out, and potentially for wash-down of site equipment. Water used for soil compaction will result in little or no runoff. Specific concrete and vehicle wash areas will be set up and are required to have plastic or similar material laid out to catch runoff and prevent potential construction contaminants from reaching drainages. Therefore, methods to prevent runoff will be in place during construction of the Project, and water quality will not be substantially degraded, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation of the facility would not generate any water. The only potential for degradation of water supplies would result from runoff at the facility. No hazardous materials would be stored on site other than fuel for the diesel generator. The diesel generators would have an integrated fuel tank of up to 1,500 gallons in capacity. The tank would meet or exceed regulatory requirements for fuel tanks and would be double-hulled to reduce the potential for any leaks. Fuel tanks are specifically designed following regulatory guidance and subsequent design standards to reduce or eliminate the potential for fuel spills. Therefore, operation of the Project would not substantially degrade water quality, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

WQ-7: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impacts

As shown in Table 3.8-2, only one proposed Project site, Site ZHQ, has a site polygon boundary that extends into a 100-year flood zone (FEMA Zone AE), having a 1-percent annual chance of flood hazard. The flood zone boundary runs roughly parallel to Zuma Beach and bisects the site from southeast to northwest. Approximately one-third of the site is within the designated 100-year flood hazard zone. The northeastern portion of the site is outside the flood hazard zone. Proposed activity at Site ZHQ would follow the eight-step process outlined in EO 11988. Additionally, the site would be subject to any local planning department review and permitting process with placing a facility within a designated floodplain. State and local planning agencies will review proposed construction plans. Any proposed structures will need to meet state and local guidelines to reduce the risk from potential damage due to an inundation flood. This may include placement of structures outside the identified flood zone or raising the elevation of foundation with appropriate erosion control above the base floodplain elevation. With adherence to state and local planning requirements, potential damage from flooding would be less than significant at Site ZHQ, and no impacts would occur at any other site.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Site ZHQ would be built to the applicable standards described under Construction Impacts, as a result the potential for the new structures to impede flood flows would be minimized. Impacts associated with operations would be less than significant at Site ZHQ. No impacts would occur at any other site.

Mitigation Measures

No mitigation measures are required.

WQ-8: Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impacts

No facilities are proposed to be built within identified flood hazard areas on any Flood Insurance Rate Map (FIRM) associated with dam or levee failure. Site ZHQ lies partially within a 100-year floodplain, and the impacts from flooding are discussed in Impact WQ-7, above. In addition, Site ASD has a water feature (the channelized San Gabriel River, approximately 500 feet west of the site). No other proposed Project sites are in floodplains or have upgradient or adjacent water impoundment features. Risk for significant risk of loss, injury, or death involving flooding, including levees or dams, is minimal at sites ASD and ZHQ; and impacts are considered less than significant. No impacts are expected at any other proposed Project site.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Project operations would result in no impact at every site except Site ZHQ. Federal, state, and local planning processes would ensure that the new construction site is either elevated above the floodplain or protected from potential floods by protective structures if necessary. The flood risk will be evaluated during the planning process, and site plans modified to ensure the flood risk would be less than significant. Therefore, operation impacts at Site ZHQ would be less than significant. No impacts would occur at any other proposed Project site.

Mitigation Measures

No mitigation measures are required.

WQ-9: Would the project expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?

Construction Impacts

No proposed Project sites are located next to lake shores or other open waterbodies that could generate a seiche during a seismic event. Therefore, there is no potential for a seiche to inundate a proposed Project site, and there would be no impact from seiches.

The Los Angeles County Department of Public Works (LACDPW) has a database and GIS information that identifies areas with potential mudflow/debris flow occurrences for the current year. This data changes from year to year depending on what areas may have burned during the previous fire season. Mudflows are more likely to occur in areas that recently experienced a wildfire, as vegetation that binds soils together has been stripped; and once the soil is saturated from a rainstorm, it may generate a mudflow. Winter rainstorms may trigger a mudflow in these areas, and this would be considered a significant impact for sites constructed in these areas. Nearly all of the proposed Project sites are located on ridges or hilltops. These areas are not susceptible to mudflows, as there are no slopes above them that could generate a mudflow. However, two sites are located in areas that may be subject to mudflows: Site ENC1, a fire camp located near a river valley; and Site PWT, located near a small swale/drainage. All other sites are located on ridgelines, hilltops, or in urban areas away from any areas that could generate a mudflow. Impacts at sites ENC1 and PWT would be considered significant. No impact would occur from mudflows at any other proposed Project site.

Site ZHQ is within a tsunami inundation area. If a tsunami large enough to inundate the proposed Project site occurs, equipment and structures would be lost. The Southern California Emergency Management systems are tied into the Pacific Rim tsunami warning system, which would allow construction workers within and near the Project site enough time so that they could leave the area without being impacted by the tsunami. Additionally, the likelihood of a tsunami hitting during the

limited construction period of six weeks is very slim or negligible. Catastrophic tsunamis occur, on average, about once or twice per century; 90 percent of them occur in the Pacific Ocean. Significant loss of property, or injury, or death from inundation at Site ZHQ would not result; and impacts would be less than significant. No impact would occur from tsunami at any other proposed Project site.

Mitigation Measures

Implementation of GEO MM 1 (completion of a geotechnical report) would identify potential design measures needed to protect against mudflows at sites ENC1 and PWT.

Impacts after Mitigation

The mitigation measures would mitigate risks associated with mudflows. The geotechnical report will identify if a particular site is at risk for a mudflow and what measures may be implemented to reduce the risk to the facility from mudflows. Design features implemented during the building permit process would reduce risk of mudflow and reduce impacts to less than significant at sites ENC1 and PWT.

Operation Impacts

Sites proposed to be built in mudflow areas will be evaluated during the design, permitting, and construction process as described above. Threats from mudflows during construction would have been mitigated to a less than significant. Operational activities (unmanned activity that does not generate any water) would not increase the risk of a mudflow occurring; therefore, impacts from mudflows would be less than significant at sites ENC1 and PWT, and there would be no impact at any other proposed Project site.

No sites are located next to open water such as a lake or large reservoir. Operational activities would not increase the risk from a seiche. Therefore, no impacts from a seiche would result.

Emergency management systems are in place to provide people the maximum time available to evacuate any area subject to tsunami inundation. Therefore, the impact to people would be less than significant. Structures at Site ZHQ, however, may be subject to a tsunami. The Los Angeles County permitting process and building inspection will require that any structure built in a tsunami inundation zone meet current building codes and may require special footings, protective structures, or other measures to reduce the risk associated with tsunami inundation. The inundation risk would have been evaluated during the planning process, and site plans would have been modified to ensure the flood risk would be less than significant. Therefore, operational impacts related to tsunamis would be less than significant at site ZHQ and there would be no impact from tsunami at any other proposed Project site.

Mitigation Measures

No mitigation measures are required.

3.8.4.2 No Project Alternative

Under the No Project Alternative, no new Project facilities would be constructed, and no new equipment would be installed. No water would be required, nor would wastewater be generated. No impervious surfaces would be created. No additional water pollutants would be generated or released. No excavation would occur. No facilities would be placed in flood zones or in areas subject to seiches or tsunamis. For these reasons, no significant direct or indirect impacts would occur to surface water or groundwater resources or water quality.

3.8.5 Cumulative Impacts

3.8.5.1 Geographic Extent

The effects of the proposed Project on hydrology/water quality are dependent on the resource considered. For purposes of the cumulative analysis the following geographic areas were considered:

- WQ-1. This significance threshold is generalized and not specific to any geography. The analysis of cumulative projects is conducted on a regional basis (i.e., inclusive of the entire proposed Project area).
- WQ-2. Because groundwater supply and groundwater recharge are specific to individual groundwater basins, the analysis for cumulative impact considers the groundwater basin that proposed Project sites and other projects identified in Table 2.7-1 are sited on.
- WQ-3. Any alteration of drainage would be contained to each proposed Project site. The cumulative impacts analysis is limited to the site boundary.
- WQ-4. The potential for cumulative exceedance of stormwater drainage systems or substantial impacts associated with additional sources of polluted runoff includes projects within the watershed of an individual site.
- WQ-5. The potential for cumulatively substantial increase in the rate or amount of surface runoff includes projects within the watershed of an individual site.
- WQ-6. This is a generalized significance threshold and not specific to any geography. The analysis of cumulative projects is conducted on a regional basis (i.e., inclusive of the entire proposed Project area).
- WQ-7. Only one proposed Project site (Site ZHQ) is within a flood zone. The geographic boundary includes cumulative projects from Table 2.7-1 within the flood zone boundary of ZHQ.
- WQ-8. Only three proposed Projects sites (sites ASD, SDW, and ZHQ) are near levees or dams. The geographic boundary includes cumulative projects from Table 2.7-1 in the vicinity of these sites.

- WQ-9. Only three proposed Project sites have been identified as having an elevated potential for flooding (sites ENC1, PWT, and ZHQ). The geographic boundary includes cumulative projects from Table 2.7-1 in the vicinity of these sites.

3.8.5.2 Existing Cumulative Conditions

Los Angeles County occupies approximately 4,083 square miles. Elevations range from sea level to 10,064 feet amsl at the summit of Mount San Antonio. Los Angeles County is approximately 25 percent mountains; 10 percent coastal plain; and 65 percent foothills, valley, and desert. Most mountains are lower than 5,000 feet amsl with only 210 square miles (5 percent) above this elevation. Surface water in streams is derived principally from precipitation, runoff, and, in some cases, groundwater (LACDRP 2015a).

Runoff characteristics are influenced by soil type, terrain, vegetation, and other conditions. Substantial surface runoff occurs after soil moisture is near field capacity and during extreme intense rainfall events. Because much of the coastal plain is urbanized, natural soil and vegetation have been replaced by impervious surfaces. In urban areas, stormwater runoff is directed to storm drains and lined channels with little opportunity for natural infiltration to groundwater aquifers (LACDPW 2006). This intensive use decreases in more rural areas, meaning sites there tend to drain to more natural drainages. Because the Project area is large and hydrologically diverse, many different hydrologic basins can be affected by project activities and the activities identified in the cumulative project list contained in Table 2.7-1.

Most groundwater production is concentrated in populated areas, particularly in southern Los Angeles County and Orange County. Published information regarding the depth of groundwater and other aquifer parameters is scarce or unavailable in sparsely populated areas or where groundwater resources have not been used extensively. Groundwater use is varied throughout the Project area; and, for purposes of this analysis, it is assumed some portion of water used for the Project would be derived from groundwater.

3.8.5.3 Cumulative Impact Analysis

WQ-1: Would the project violate any water quality standards or waste discharge requirements?

No violation of water quality standards or waste discharge requirements was identified for roof mount or collocation sites. Impacts associated with dewatering activities at sites where new monopoles or lattice towers are proposed would be fully mitigated with application of UTI MM 1. Since no project-specific impacts were identified, no cumulative impacts associated with the proposed Project would occur.

WQ-2: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Impacts associated with groundwater depletion from the proposed Project were considered less than significant. From the list of over 700 past, present, and reasonably foreseeable projects identified in Table 2.7-1, it is uncertain whether any would be groundwater-dependent and what the water requirements at each project would be. Impacts associated with depletion of groundwater supplies were assumed to be significant. The contribution of proposed Project sites would be minimal, due to the minimal use of water projected. The proposed Project's contribution to this significant impact would not be cumulatively considerable.

Impacts associated with interference with groundwater recharge from the proposed Project were considered less than significant. From the list of over 700 past, present, and reasonably foreseeable projects identified in Table 2.7-1, the extent of new impervious surfaces that would be created is uncertain. Impacts associated with creation of new impervious surfaces' interference with groundwater recharge were assumed to be significant. The contribution of proposed Project sites would be minimal due to the minimal amount of new impervious surface area created. The proposed Project's contribution to this significant impact would not be cumulatively considerable.

WQ-3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?

No proposed Project site is located at or near a stream or river, nor would any proposed site require substantial alteration of existing drainage. No impacts were identified, and no cumulative impact would occur from project implementation.

WQ-4: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

No proposed Project site would require construction or operations activities that would alter an existing drainage pattern of a site or substantially increase the rate or amount of surface runoff. No impacts were identified, and no cumulative impact would occur from project implementation.

WQ-5: Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Runoff from all sites would be controlled through BMPs. Any activity requiring dewatering would require a NPDES permit which would govern activities at each of these sites. Project-specific impacts associated with construction and operations would be less than significant.

Cumulative impacts would potentially occur from other projects identified on Table 2.7-1. Cumulative impacts would be limited to the watershed where individual project sites are located. The impacts from the projects identified in Table 2.7-1 in each of the watersheds where proposed Project sites are located

are summarized in Table 3.8-3. Since all sites are subject to the building permit process, which requires consideration of storm drainage and requires BMPs to direct site drainage and prevent runoff from pollution, the impact is considered less than significant.

Table 3.8-3: Watersheds Potentially Affected by Proposed and Cumulative Projects

Site ID	Watershed (NHD HUC12)	Watershed (NHD HUC12) Name	Number of Cumulative Projects Located in Watershed
AGH	180701040102	Medea Creek	40
AJT	180701060605	Carbon Creek	3
ASD	180701060606	Coyote Creek-San Gabriel River	6
BJM	180701070003	Santa Catalina Island-Frontal Pacific Ocean	0
BUR	180701020302	Fish Canyon	0
BUR1	180701020302	Fish Canyon	0
BUR2	180701020302	Fish Canyon	0
BUR3	180701020302	Fish Canyon	0
CPK	180701040203	Zuma Canyon-Frontal Pacific Ocean	58
DPK	180701070003	Santa Catalina Island-Frontal Pacific Ocean	0
ENC1	180701040203	Zuma Canyon-Frontal Pacific Ocean	58
ENT	180701040401	Garapito Creek	0
FRP	180902080401	Sheep Creek	0
FTP	180701050210	Scholl Canyon-Los Angeles River	2
GMT	180701020402	San Francisquito Canyon	1
GRM	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
H-17A	180701060602	La Mirada Creek	13
H-69B	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
JOP	180701050103	Upper Big Tujunga Creek	0
JPK	180701060401	San Dimas Wash	0
JPK2	180701060402	Big Dalton Wash	2
LACF072	180701040202	Arroyo Sequit-Frontal Pacific Ocean	58
LACFCP08	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
LACFCP09	180701050206	Lower Pacoima Wash	0
LACFCP11	180701020105	Arrastre Canyon-Santa Clara River	0
LARICSHQ	180701050401	Chavez Ravine-Los Angeles River	5
LEPS	180701040202	Arroyo Sequit-Frontal Pacific Ocean	58
LPC	180701050206	Lower Pacoima Wash	0
MMC	180701020104	Agua Dulce Canyon	0
MML	180701050205	Upper Pacoima Wash	1
MTL2	180701050105	Lower Big Tujunga Creek	1
OAT	180701050203	Aliso Canyon Wash	0

Table 3.8-3: Watersheds Potentially Affected by Proposed and Cumulative Projects

Site ID	Watershed (NHD HUC12)	Watershed (NHD HUC12) Name	Number of Cumulative Projects Located in Watershed
PASPD01	180701050303	Alhambra Wash-Rio Hondo	37
PDC	180701040300	Ballona Creek	54
PHN	180701060502	Lower San Jose Creek	3
PMT	180701060601	Santa Fe Flood Control Basin-San Gabriel River	0
PWT	180701040203	Zuma Canyon-Frontal Pacific Ocean	58
RIH	180701060606	Coyote Creek-San Gabriel River	6
SDW	180701060402	Big Dalton Wash	2
SGH	180701050402	Compton Creek-Los Angeles River	13
SIM	180701050208	Tujunga Wash-Los Angeles River	19
SPN	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
SUN	180701060401	San Dimas Wash	0
SUN2	180701060401	San Dimas Wash	0
TMT	180902080401	Sheep Creek	0
TOP	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
TPK	180902061301	Oso Canyon	0
TWR	180701070002	Santa Catalina Island-Frontal San Pedro Channel	14
VPK	180701050208	Tujunga Wash-Los Angeles River	19
WAD	180701040300	Ballona Creek	54
WMP	180701020602	Fish Creek-Piru Creek	0
WS1	180701040403	Santa Monica Beach-Frontal Santa Monica Bay	141
WTR	180701020603	Lake Piru-Piru Creek	0
ZHQ	180701040203	Zuma Canyon-Frontal Pacific Ocean	58

WQ-6: Would the project otherwise substantially degrade water quality?

As described previously, runoff from all sites would be controlled through BMPs, and any activity requiring dewatering would be conducted in accordance with the applicable required NPDES permit. The potential for Project-specific activities to generally degrade water quality were determined less than significant.

Cumulative impacts would potentially occur from other projects identified on Table 2.7-1. Cumulative impacts would be limited to the watershed where individual project sites are located. The impacts from the projects identified in Table 2.7-1 in each of the watersheds where proposed Project sites are located are summarized in Table 3.8-3. Since all sites are subject to the building permit process, which requires consideration of storm drainage and requires BMPs to direct site drainage and prevent runoff from pollution, the impact is considered less than significant.

WQ-7: Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Only one proposed Project site (Site ZHQ) intersects with a flood zone (a tsunami inundation zone associated with the Pacific Ocean); and proposed construction on the site would meet federal, state, and local planning requirements. The flood zone is an extension of the Pacific Ocean. Only one other project, a bathroom renovation at Zuma Beach, was identified. The potential for impeding flood flows associated with the Pacific Ocean for these projects is considered minimal, and impacts would be less than significant.

WQ-8: Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Two sites were identified that have flood prevention structures or a potential to flood:

- Site ASD is approximately 500 feet from the San Gabriel River. A total of six projects on Table 2.7-1 are within the San Gabriel River / Coyote Creek watershed. Project-specific impacts were considered less than significant. The San Gabriel River is highly modified for the purpose of containing floods, and the potential for failure of the channel associated with runoff from these six projects is minimal. Impacts would be less than significant.
- Site ZHQ is in a floodplain (part of the Pacific Ocean tsunami inundation zone). A potential for flooding exists at the site, but proposed activity at Site ZHQ would be managed in accordance with applicable requirements associated with development in the floodplain; and impacts associated with flooding would be less than significant. Fifty eight other projects were identified in Table 2.7-1 within the Zuma Canyon-Frontal Pacific Ocean watershed. No potential exists for these cumulative projects to combine to substantively affect tidal inundation. Impacts would be less than significant.

WQ-9: Would the project expose people or structures to a significant risk of loss, injury, or death from inundation by seiche, tsunami, or mudflow?

No proposed Project sites are located on an enclosed or partially enclosed water body, and no potential for seiches exists. Site ZHQ is within a tsunami inundation zone and discussed above, and no significant cumulative impact associated with exposure to tsunami is anticipated. Two sites, Site ENC1 and Site PWT, are located in conditions that could potentially be subjected to mudflows. Impacts associated with potential mudflows at these sites would be reduced to less than significant once measure GEO MM 1 is implemented. Both sites are in the same watershed (Zuma Canyon - Frontal Pacific Ocean) as 58 cumulative projects identified in Table 2.7-1. Of these 58 cumulative projects, none was located upslope from either Site ENC1 or Site PWT. It was not determined whether projects identified on Table 2.7-1 would potentially trigger mudflow, but the potential for these impacts was assumed to be significant. Because proposed work at sites ENC1 or PWT would not likely trigger mudflows on site, they would not

likely affect downslope areas where other cumulative construction may occur. Therefore, the proposed activities sites ENC1 or PWT would not be cumulatively considerable.

3.9 Land Use/Planning

This section addresses several aspects of land use, including land jurisdiction, zoning, special land use designations, the regulatory environment, and how development as well as operations and maintenance of proposed Project sites could affect land use. Special land use designations evaluated in the analysis include coastal zones and lands subject to Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs). Lands with special farmland designations (prime farmland, unique farmland, farmland of statewide importance), lands limited to agricultural and open space uses per Williamson Act contracts, and forest timberland do not occur within the Project area were found in the Initial Study (see Appendix A-2) to be not applicable to this analysis, and are not addressed further in this discussion.

3.9.1 Environmental Setting

3.9.1.1 Land Jurisdiction

Los Angeles County consists of approximately 4,058 square miles of land (USCB 2010) and includes San Clemente and Santa Catalina islands. The county includes 88 incorporated cities and many unincorporated areas.

All Project sites are located within Los Angeles County with the exception of AeroJet (AJT), which is within San Bernardino County. Portions of Los Angeles and San Bernardino counties are administered by federal and state agencies. Table 3.9-1 indicates agencies with jurisdiction of the proposed Project sites.

Table 3.9-1: Proposed Project Site Land Jurisdiction

Site ID	Site Name	City Location or Unincorporated County	Federal Jurisdiction (where applicable)	State Jurisdiction (where applicable)
AGH	Agoura Hills	Agoura Hills		
AJT	AeroJet	Chino Hills		
ASD	Auto Square Drive	Cerritos		
BJM	Black Jack Peak	Unincorporated		
BUR	Burnt Peak	Unincorporated	USFS, ANF	
BUR1	Burnt Peak-1	Unincorporated	USFS, ANF	
BUR2	Burnt Peak-2	Unincorporated	USFS, ANF	
BUR3	Burnt Peak-3	Unincorporated	USFS, ANF	
CPK	Castro Peak	Unincorporated		
DPK	Dakin Peak	Unincorporated		
ENC1	Encinal 1 (Fire Camp 13)	Calabasas		
ENT	Entrada Tank Site	Unincorporated		
FRP	Frost Peak (Upper Blue Ridge)	Unincorporated	USFS, ANF	

Table 3.9-1: Proposed Project Site Land Jurisdiction

Site ID	Site Name	City Location or Unincorporated County	Federal Jurisdiction (where applicable)	State Jurisdiction (where applicable)
FTP	Flint Peak	Glendale		
GMT	Grass Mountain	Unincorporated	USFS, ANF	
GRM	Green Mountain	Los Angeles		California Department of Parks and Recreation
H-17A	H-17A	Whittier		
H-69B	H-69B	Unincorporated		
JOP	Josephine Peak	Unincorporated	USFS, ANF	
JPK	Johnstone Peak-1	San Dimas	USFS, ANF	
JPK2	Johnstone Peak-2	San Dimas	USFS, ANF	
LACF072	County FS 72	Unincorporated		
LACFCP08	Camp 8	Unincorporated	NPS, SMMNRA	
LACFCP09	County CP 9	Unincorporated	USFS, ANF	
LACFCP11	County CP 11	Unincorporated	USFS, ANF	
LARICSHQ	LA-RICS Headquarters	Monterey Park		
LEPS	Lower Encinal Pump Station	Malibu		
LPC	Loop Canyon	Unincorporated	USFS, ANF	
MMC	Mount McDill	Palmdale		
MML	Magic Mountain Link	Unincorporated	USFS, ANF	
MTL2	Mount Lukens-2	Unincorporated and Los Angeles	USFS, ANF	
OAT	Oat Mountain-1	Unincorporated		
PASPD01	Pasadena Police Dept.	Pasadena		
PDC	Pacific Design Center	West Hollywood		
PHN	Puente Hills	Unincorporated		
PMT	Pine Mountain	Unincorporated	USFS, ANF	
PWT	Portshead Tank	Malibu	NPS, SMMNRA	
RIH	Rio Hondo	Unincorporated		
SDW	San Dimas	San Dimas		
SGH	Signal Hill	Signal Hill		
SIM	Simpsons' Building	Unincorporated		
SPN	Saddle Peak	Unincorporated		
SUN	Sunset Ridge	Unincorporated	USFS, ANF	
SUN2	Sunset Ridge-2	Unincorporated	USFS, ANF	
TMT	Table Mountain	Unincorporated	USFS, ANF	
TOP	Topanga Peak	Unincorporated		

Table 3.9-1: Proposed Project Site Land Jurisdiction

Site ID	Site Name	City Location or Unincorporated County	Federal Jurisdiction (where applicable)	State Jurisdiction (where applicable)
TPK	Tejon Peak	Unincorporated		
TWR	Tower Peak	Unincorporated		
VPK	VPK	Glendale		
WAD	Walker Drive	Beverly Hills		
WMP	Whittaker Middle Peak	Unincorporated	USFS, ANF	
WS1	100 Wilshire	Santa Monica		
WTR	Whittaker Ridge	Unincorporated	USFS, ANF	
ZHQ	Zuma Life Guard HQ	Malibu		
ANF - Angeles National Forest SMMNRA – Santa Monica Mountains National Recreation Area USFS – U.S. Forest Service				

3.9.1.2 Existing Land Use and Zoning

State and federal agencies often prepare management plans that may identify land uses compatible with the values of the land being managed. Some federal lands are identified as appropriate for multiple-uses, while other tracts of land may have a specific use, such as wilderness.

Twenty-two of the proposed Project sites are on lands administered by the following federal agencies with 20 sites on USFS land and two sites on NPS land.

U.S. Forest Service

USFS has prepared a Land Management Plan that includes the vision for southern California national forests and the Angeles National Forest Strategy (USFS 2005a, 2005b). Proposed Project sites within the Angeles National Forest (ANF) are located within the following land use designations: Developed Area Interface, Back Country, Back Country Motorized Use Restricted, and Experimental Forest.

Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrate on improving facilities before developing new ones (USFS 2005b).

Back Country includes areas of the national forest that are generally undeveloped and have few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The

level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS 2005b).

Back Country Motorized Use Restricted includes areas of the national forest that are generally undeveloped and have few roads. Few facilities are found in this zone, but some may occur in remote locations. Motorized use is restricted to administrative purposes only; this includes USFS and other agency or tribal government needs, as well as access needed to private land or authorized special uses. Although this zone allows a range of low intensity land uses, the management intent is to retain the natural character of the zone and limit the level and type of development (USFS 2005b).

Experimental Forest zone serves as a research and demonstration area and is generally closed to the public except by permit. The San Dimas Experimental Forest (SDEF) is a protected field laboratory for studies of hydrology, fire, and other topics relating to the ecology of chaparral and related ecosystems. It has been closed to the general public, except under special written permit. Uses within the SDEF include a communications site that was authorized by special-use authorization (USFS 2005b).

The Southern California National Forests have established design criteria for protection and conservation of bird species at mountain top communications sites. In addition to criteria to prevent bird perching and entrapment, specifications pertaining to location and structure are useful land use guidance for establishing compatibility with the Forest Service planning documents. These design criteria include:

- New towers shall be the same or less than the tower height of existing towers at the site. New towers shall be no more than 199 feet above ground level and shall not require guy wires.
- Towers shall be unlighted if FAA regulations permit.
- To reduce the number of towers needed in the future, providers shall design new towers structurally and electrically to accommodate comparable antennas for multiple users.
- Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.
- Road access to mountain top communication sites must be adequate to support construction, maintenance and demolition of facilities.

National Park Service

The NPS administers the land at two proposed Project sites (LACFCP08 and PWT) within the SMMNRA. In accordance with the Superintendent's Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority (NPS 2014b), construction of a structure requires a permit from the Superintendent, but wireless communications sites development or use are not otherwise specified for this unit of the NPS system.

Topanga State Park

Topanga State Park offers limited camping opportunities, a nature center, and an extensive trail system. The Topanga State Park General Plan (California State Parks [CSP] 2012) contains goals and guidelines for the management of natural and cultural resources within the park. These include specific guidelines to protect natural and cultural resources and to establish management guidelines and policies for visitor use and development. The General Plan does not specifically address communication facilities, but identifies that exterior treatment of new infrastructure should be designed to blend with the park's landscape characteristics, and that infrastructure planning should avoid or mitigation for habitat degradation and fragmentation.

Local Agencies

Cities and counties adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. Pursuant to California Government Code section 65302, each plan must contain the following mandated seven components or elements: land use, circulation, housing, conservation, open-space, noise, and safety. Cities, towns, and local entities typically use zoning designations to indicate the type of land use (such as residential, commercial, industrial, etc.) and the intensity of the use allowed within an area. Zoning designations regulate the use, form, design, and compatibility of development with the purpose of segregating uses that are thought to be incompatible and to preserve the character of a particular community or neighborhood. For example, in the case of the proposed Project sites, zoning designations may have restrictions on the height of support structures. Zoning is commonly controlled by local governments such as counties or municipalities.

The Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such local plans, policies, and regulations are not applicable to the Project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, this Draft EIR references, describes, and addresses local land-use plans, policies, and regulations. The Draft EIR takes this approach in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies, and regulations assists in determining whether the proposed Project may conflict with nearby land uses, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts.

3.9.1.3 Special Land Use Designations

In addition to planning and zoning designations, certain lands are given special designations to preserve or protect features and characteristics of the land. These include coastal zones, timberlands, and lands subject to an HCP and/or an NCCP. No proposed Project sites are within designated timberlands, or NCCPs. As such, timberlands and NCCPs are not discussed further in this section.

Coastal Zones

The federal Coastal Zone Management Act (CZMA) of 1972 applies to federal activities, development projects, permits and licenses, and similar project activities that would be located within coastal resources or have the potential to affect them. Congress later delegated coastal resource management to states' coastal management programs. In 1977, the federal government certified the California Coastal Management Program (CCMP). The enforceable policies of that document are in Chapter 3 of the California Coastal Act of 1976 (Coastal Act), and are administered by the California Coastal Commission (CCC).

The mission of the CCC is to protect, conserve, restore, and enhance environmental and human-based resources of the California coast and ocean for environmentally sustainable and prudent use. The Coastal Act addresses issues such as shoreline public access and recreation, reduced cost for visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the CCC and by local governments.

The CCC makes coastal development permit decisions and reviews Local Coastal Programs (LCPs) prepared by local governments. It also reviews federal activities that affect the Coastal Zone.

LCPs are the basic planning tools used by the state and local governments in their shared stewardship of the coast. They specify appropriate location, type, and scale of new or changed uses of land and water by inclusion of a land use plan and measures to implement the plan (such as a zoning ordinance). Once certified by the CCC, LCPs govern decisions that determine the short- and long-term conservation and use of coastal resources. While each LCP reflects the unique characteristics of its local coastal community, all regional and statewide interests and concerns must also be addressed in the LCP to conform to Coastal Act goals and policies (CCC 2014).

The state's coastal zone jurisdiction is divided into 126 geographic segments. As of 2014, 73 percent of the LCP segments have been certified, representing close to 87 percent of the geographic area of the coastal zone in which local governments have delegated authority to issue coastal permits (CCC 2014). For segments without a certified LCP or delegated local authority, the regulatory review and permit process remains with the CCC.

An LCP comprises a land use plan and an implementation plan. The land use plan describes existing conditions and issues in the coastal zone and presents land use and development policies to fulfill the intent of the Coastal Act. Should conflicts arise between the land use plan and other local planning documents, such as the General Plan, the policies and regulations of the LCP take precedence within the coastal zone. The implementation plan provides for how the LCP is regulated and what entity has review authority.

All LCPs must be consistent with the Coastal Act, specifically with Chapter 3, which sets broad coastal zone policy for planning and managing coastal resources. The Chapter 3 policies focus on the protection and sustainability of land resources (Article 5) and guide new development within the coastal zone (Article 6). While the Coastal Act's policies do not specifically address communication facilities development, any new development must be consistent with the Chapter 3 policies. Therefore, communication facility projects within the coastal zone are expected to demonstrate that they would not be detrimental to land resources such as sensitive habitats, agricultural lands, and archaeological resources. Similarly, communication facility projects should demonstrate that they support policies for coastal access, visitor-serving uses, coastal-dependent development, and preservation of aesthetic resources. LCPs established by local agencies may be more specific and restrictive, provided that they are consistent with Chapter 3 at a minimum. For coastal zone segments without a certified LCP, Chapter 3 policies prevail as guiding land use policy.

The study area encompasses the Santa Monica Mountains Coastal Zone, the City of Malibu Coastal Zone, the City of Santa Monica Coastal Zone, and the Santa Catalina Island Coastal Zone.

The *Santa Monica Mountains Land Use Plan*, a component of the Santa Monica Mountains LCP, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (LACDRP 2014). Goals and policies from the Land Use Plan that may pertain to prepared development and operation of the proposed Project sites include:

- Limit structure heights to ensure protection of scenic resources and compatibility with surrounding settings (Pattern and Character of Development Policy LU-38)
- Limit the visual and safety impacts of wireless telecommunications facilities to preserve the character and aesthetics of surrounding areas through careful design, screening, and mitigation requirements. Encourage undergrounding of accessory equipment, collocating, and clustering wireless telecommunication facilities and structures, wherever possible, to help avert unnecessary proliferation of such facilities (Pattern and Character of Development Policy LU-52)
- All facilities and related support structures shall be sited, designed, and operated to avoid when possible the visibility of the facility from public viewing areas and to preserve the character of surrounding areas by protecting ridgelines by setting facilities below the ridge and collocating facilities, where feasible, to avoid proliferation of facilities (Pattern and Character of Development Policy LU-54)
- All facilities [particularly most new or replacement communication transmission lines] shall place support facilities underground, where feasible (Pattern and Character of Development Policy LU-55)
- Require that the extension of water, sewer, or utility infrastructure to serve development be located within legally existing roadways and road rights-of-way in a manner that avoids adverse

impacts to coastal resources to the maximum extent feasible (Development and Environmental Resources Policy LU-12)

- The height of structures shall be limited to minimize impacts to scenic resources (Hillside Management Policy CO-110)
- Avoidance of impacts to scenic resources through site selection and design alternatives is the preferred method over landscape or building material screening. Landscape or building material screening shall not substitute for project alternatives including re-siting or reducing the height or bulk of structures (Scenic Resources Policy CO-132)
- Prohibit development on designated significant ridgelines and require that structures be located sufficiently below such Ridgelines to preserve unobstructed views of a natural skyline. In addition, all ridgelines other than significant ridgelines that are visible from a scenic route, public parkland, public trails, or a beach shall be protected by siting new development below the ridgeline to avoid intrusions into the skyline where feasible. Where there is no feasible alternative building site or where the only alternative building sites below the ridgeline would result in unavoidable impact to HI or 1-12 habitat areas, structures shall be limited to one story (18 feet maximum from existing or finished grade, whichever is lower) to minimize visual impacts and preserve the quality of the scenic area (Scenic Resources Policy CO-136)
- Require wireless telecommunication facilities to be designed and sited in such a manner that they minimize impacts to visual resources and blend into the landscape. Such facilities shall be collocated where feasible. This may include requiring one taller pole rather than multiple shorter poles. New wireless telecommunication facilities may be disguised as trees of a species that would likely be found in the surrounding area and that blend with the natural landscape when it is not feasible to co-locate on an existing pole (Scenic Resources Policy CO-152)
- New and replacement infrastructure may be permitted provided that it complies with applicable provisions of this plan and is designed to avoid and, if infeasible, minimize adverse impacts to environmental and scenic resources. New roads shall be constructed only to provide access to lawfully approved proposed new development and shall comply with the road standards found in the Local Implementation Program. New and replacement utilities shall be developed only to serve legally established uses (Biological Resources Policy CO-48)

The *City of Malibu Coastal Zone Land Use Plan* was adopted by the CCC on September 13, 2002, and provides for communication facilities as a conditional use in all land use designations. Policies in the Land Use Plan or the Local Implementation Plan that may apply to the proposed Project sites include:

- Communication processing, storage, and transmission facilities and lines shall be sited, designed, and operated to avoid or minimize impacts to Environmentally Sensitive Habitat Areas and scenic resources, consistent with all provisions of the LCP. If no feasible alternative can eliminate all impacts, then the alternative that would result in the fewest or least significant impacts shall be selected.

- All facilities and related support structures shall be sited, designed, and operated to avoid the visibility of the facility from public viewing areas and to preserve the character of surrounding areas by protecting ridgelines by setting facilities below the ridge and collocating facilities, where feasible, to avoid proliferation of facilities.
- All facilities shall place support facilities underground, where feasible. New communication transmission lines shall be sited and designed to be located underground, except where it would present or contribute to geologic hazards. Existing communication transmission lines should be relocated underground when they are replaced or when funding for undergrounding is available.
- The maximum height of ground or building-mounted antennas shall not exceed 28 feet; however, if the antenna elements are mounted flush on an existing structure that exceeds 28 feet, the antenna elements may be equal to the height of the building. Roof-mounted antennas may extend no more than 3 feet above the roof from which they are attached.
- Prominent ridgelines and other intervening ridgelines that are visible from a public road, a beach, public viewing areas, or public hiking trails shall be protected by setting structures below the ridgeline to avoid intrusions into the skyline where feasible. Where no feasible alternative building sites are below the ridgeline or where the only alternative building site would result in unavoidable adverse impacts to environmentally sensitive habitat areas (ESHA), structures shall be limited to one story (18 feet maximum from existing or finished grade, whichever is lower) in height to minimize visual impacts.

The *City of Santa Monica Local Coastal Program Land Use Plan* does not discuss communication facilities. The only mention of utilities is to indicate that conversion or rehabilitation of existing structures that involves replacement or relocation of utilities shall provide underground utilities. One proposed Project site, 100 Wilshire (WS1), is located within the City of Santa Monica Coastal Zone and within an area classified as Residential-Visitor Commercial, which allows for three-story (45-foot) structures (City of Santa Monica 1992). Policies that may apply to the Project site include:

- The scenic and visual qualities of the Coastal Zone shall be considered and protected as an important public resource.
- All new development in the Coastal Zone, including any conversion or rehabilitation of existing structures which involves the replacement or relocation of the existing electrical service, shall provide underground utilities.
- New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this Land Use Plan.

The *Santa Catalina Island Local Coastal Plan* was approved by the Los Angeles County Board of Supervisors on March 15, 1983, and was certified by the CCC on November 17, 1983. Areas in the Plan allocated for industrial, transportation, and utilities include the existing Airport-In-The-Sky and Pebbly

Beach, although utilities are allowed in other development areas provided that the placement of such facilities is otherwise consistent with the policies of the Local Coastal Plan. Plan policies and recommended actions that may pertain to proposed development of proposed Project sites include:

- Limit new development in scope and carefully design it to be compatible with the unique character of the Island.
- Relate new development to the natural character of the Island by limiting building heights (except for selected architectural accents approved through design review), specifying types of building materials and sensitively reviewing designs and landscaping materials.
- Mitigate environmental impacts by channeling development into already developed and/or publicly used areas; minimizing grading (cut and fill) operations; avoiding steep slopes, tsunami run-up areas, archaeological sites, landslide areas, and view corridors; and by ensuring the provision of sufficient water resources and solid and liquid waste facilities prior to development approvals.
- New development... shall be attractively designed to protect highly scenic natural or historical areas. Views of the shoreline, both from the land and water, should also be protected.
- Priority shall be assigned to protection of the land/water interface, ridgelines, distinctive geologic features, native trees and vegetation, natural streams, and riparian habitats.
- All intensive new development shall be channeled into non-easement areas adjacent to already existing development such as Two Harbors, Avalon Canyon, Empire Landing, White's Landing, Airport-In-The-Sky, and Pebbly Beach.
- Plant materials shall be used to integrate the man-made and natural environments, to screen or soften visual impacts of new developments, and to provide diversity within developed areas. Native vegetation shall be favored in easement areas while introduced vegetation from similar climates, such as palm trees and eucalyptus, shall be permitted in the more "urban" environments (e.g., Avalon Canyon, Two Harbors).
- Discourage siting of facilities such as communications facilities and park ranger stations in high-visibility locations.

Lands Subject to Habitat Conservation Plans

Some lands within the Project area are located within protected wildlife areas subject to an HCP. An HCP is a land management agreement generally between the land owner and the U.S. Fish and Wildlife Service (USFWS) to protect and improve habitat for federally protected species.

The West Mojave HCP, covering 9.3 million acres of land and amending the California Desert Conservation Area Plan, is implemented by the BLM, San Bernardino County, and several municipalities. Its main goal is protecting and managing over 100 listed or sensitive species. Plan objectives include protecting large habitat blocks, avoiding human impacts on conservation areas, considering habitat

specialists in conservation efforts, maintaining biodiversity and providing a streamlined process for incidental take permits. The plan also provides for large areas of disturbed lands to be available for development, recreation, and resource extraction (BLM, California Desert District 2005).

Table 3.9-2 identifies those proposed Project sites that are located on lands with these special management designations. If a proposed Project site is not listed in the table, it is not within a coastal zone or on land subject to an HCP.

Table 3.9-2: Proposed Project Sites Within a Coastal Zone or on Land Subject to a Habitat Conservation Plan

Site ID	Site Name	Within Coastal Zone	Within Land Subject to a Habitat Conservation Plan
BJM	Black Jack Peak	Santa Catalina Island Coastal Zone	
CPK	Castro Peak	Santa Monica Mountains Coastal Zone	
DPK	Dakin Peak	Santa Catalina Island Coastal Zone	
ENC1	Encinal 1 (Fire Camp 13)	Santa Monica Mountains Coastal Zone	
H-69B	H-69B	Santa Monica Mountains Coastal Zone	
LACF072	County FS 72	Santa Monica Mountains Coastal Zone	
LACFCP08	Camp 8	Santa Monica Mountains Coastal Zone	
LEPS	Lower Encinal Pump Station	Malibu Coastal Zone	
MMC	Mount McDill	N/A	West Mojave HCP
PWT	Portshead Tank	Malibu Coastal Zone	
SPN	Saddle Peak	Santa Monica Mountains Coastal Zone	
TOP	Topanga Peak	Santa Monica Mountains Coastal Zone	
TWR	Tower Peak	Santa Catalina Island Coastal Zone	
WS1	100 Wilshire	City of Santa Monica Coastal Zone	
ZHQ	Zuma Life Guard HQ	Malibu Coastal Zone	

Sources: California Conservation Easement Database 2014

3.9.2 Regulatory Setting

3.9.2.1 *Federal Regulatory Setting*

National Oceanic and Atmospheric Administration, Office of Ocean and Coastal Resource Management

Coastal Zone Management Act

The Coastal Zone Management Act (CZMA) was enacted in 1972 to protect the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. The CZMA provisions help states develop coastal management programs to manage and balance competing uses of coastal zones. Federal actions that are likely to affect land or water uses or natural resources of the coastal zone must be consistent with enforceable policies of a state's federally approved coastal management program. As the lead federal agency for the proposed LMR project, FEMA documents this by preparing a Consistency Determination. When a private entity proposes to develop within a coastal zone and the activity requires a federal license or permit, the applicant must demonstrate consistency with the state's coastal management program by preparing a Consistency Certification.

U.S. Fish and Wildlife Service

Endangered Species Act

Section 10(a)(1)(B) of the Federal Endangered Species Act pertains to the development of HCPs. HCPs are required as part of an application for an Incidental Take Permit. HCPs also are designed to protect and improve habitat and its associated federally protected species subject to the Federal Endangered Species Act.

U.S. Department of Agriculture

National Forest Management Act

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS 2005b).

U.S. Department of the Interior

Organic Act

The 1916 Organic Act established the National Park Service (NPS) "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." NPS units prepare general management plans (GMPs) to set long-term goals for individual

park units that clearly define conditions to be achieved and maintained over time and the conditions necessary for visitors to enjoy the park's significant resources (NPS 2006). Portions of the Santa Monica Mountains National Recreation Area are administered by NPS per the Santa Monica Mountains National Recreation Area GMP, which provides a framework for managing development, visitation, and natural and cultural resources. The Land Protection Plan (NPS 1998) focuses on the execution and implementation of land protection strategies through effective use of available funds.

3.9.2.2 State Regulatory Setting

California Coastal Commission

The California Coastal Act of 1976 provides for the transfer of most of the authority to local governments through adoption and certification of LCPs. LCPs contain the rules for future development and protection of coastal resources, including appropriate location, type, and scale of new or changed uses of land and water. Each LCP includes a land use plan and measures to implement the plan (such as zoning ordinances) (CCC 2014). Once an LCP has been certified, a local government may issue coastal development permits.

The CCC is tasked with protection of coastal resources, including shoreline public access and recreation, lower-cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. Development in the coastal zone usually requires a coastal development permit. Development activities include, but are not limited to, construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters. The CCC issues coastal development permits, although a local agency takes over this responsibility once an LCP has been certified by the CCC (CCC 2001; Government Printing Office 1977).

3.9.2.3 Local Regulatory Setting

In accordance with California State law (Title 7, Division 1, Chapter 3, Article 5 §65300), cities and counties prepare and adopt a General Plan to guide the growth and land development within their jurisdiction. As noted previously, the Authority is not subject to certain local land-use plans, policies, and regulations, per the doctrine of intergovernmental immunity; however, the proposed Project must comply with the Los Angeles County General Plan, even though it is exempt from compliance with the County's zoning ordinance. Therefore, the following analysis discusses local land use restrictions as identified in local general plans and zoning ordinances to assist in determining whether the proposed Project may conflict with nearby land uses, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts. It also discusses consistency with the Los Angeles County General Plan.

Los Angeles County General Plan policies pertinent to the proposed Project include:

- Avoid severe hazard areas, such as flood-prone areas, active fault zones, steep hillsides, landslide areas, and fire hazard areas.
- Protect areas that have significant natural resources and scenic values, including Significant Ecological Areas, the coastal zone, and prime agricultural lands.
- Protect cultural heritage resources.
- Conserve the available supply of water and protect water quality.
- Ensure that development in non-urban areas is compatible with rural lifestyles, does not necessitate the expansion of urban service systems, and does not cause significant negative environmental impacts or subject people and property to serious hazards.
- Maintain high-quality emergency response services.
- In national forests, maintain the mountains in open space and non-urban uses similar to the present pattern of use.

Zoning ordinances provide the written laws and regulations that define how property in a specific geographic zone can be used. Antennas and similar structures are addressed in Chapter 22.52 of the Los Angeles County Code. To resolve ambiguity of the code, the Los Angeles County Department of Regional Planning (LACDRP) issued Policy No. 01-2010 (dated July 26, 2010), which establishes zoning ordinance policy for permitting wireless telecommunications facilities in the County (LACDRP 2010). The policy establishes various design and site placement criteria, which include a maximum height of 75 feet and requirement to incorporate camouflage techniques for all new facilities. Other Los Angeles County zoning ordinances addressing wireless and other telecommunication facilities are specific to the Santa Monica Mountains Local Implementation Plan, Community-wide Development Standards (addressed in Title 22, Planning and Zoning, Chapter 22.44, Supplemental Districts, Part 10). Key standards include limiting equipment to that necessary for the site, putting related communications and power lines underground, avoiding scenic resources and public viewing areas, avoiding H1 habitat areas, structurally designing new monopoles and lattice towers to accommodate collocation of at least one other wireless facility, and collocating on existing facilities where feasible.

Table 3.9-3 identifies the General Plans and Zoning Ordinances for the municipalities within the Project area in which a Project site is proposed (see Table 3.9-1). The documents listed in Table 3.9-3 provide the source data used to complete Table 3.9-4.

Table 3.9-3: General Plans and Zoning Ordinances in the Project Area

City or County	General Plan Name	Date of Last Update	Zoning Ordinance Name	Date of Last Update
Agoura Hills	City of Agoura Hills General Plan Update	06/30/2011	City of Agoura Hills' Municipal Code	03/31/2014
Beverly Hills	City of Beverly Hills General Plan	11/15/2011	Beverly Hills, California City Code	03/21/2014
Calabasas	City of Calabasas 2030 General Plan	October 2015	City Calabasas Municipal Code	8/27/15
Cerritos	Cerritos General Plan	01/30/2014	Cerritos Municipal Code	06/26/2014
Chino Hills	City of Chino Hills Draft 2014 General Plan Update	2014	Chino Hills Municipal Code	06/11/2013
Glendale	Glendale General Plan (consists of 11 elements)	Land Use Element amended 2006	Zoning Ordinance of the City of Glendale	06/2015
Los Angeles County	Los Angeles County General Plan 2035	02/04/2014	Los Angeles County Code	08/20/2014
Malibu	City of Malibu General Plan	2013	Malibu Municipal Code	06/2014
Monterey Park	City of Monterey Park General Plan	Not identified	Monterey Park Municipal Code	11/2014
Palmdale	Palmdale General Plan	01/25/1993	Palmdale Zoning Ordinance	12/14/1994
Pasadena	The City of Pasadena Comprehensive General Plan	11/08/2004	The City of Pasadena Zoning Code	02/26/2005
San Dimas	City of San Dimas General Plan	09/1991	San Dimas Municipal Code	07/2014
Santa Monica	City of Santa Monica General Plan	Land Use Element updated 07/06/2010	Santa Monica Municipal Code	08/2014
Signal Hill	City of Signal Hill General Plan	02/04/2014	City of Signal Hill, California, Municipal Code	05/20/2014
West Hollywood	West Hollywood General Plan 2035	09/19/2011	West Hollywood Municipal Code	05/2014
Whittier	Whittier General Plan	Not listed	Whittier Municipal Code	07/08/2014

3.9.3 Significance Criteria

The proposed Project would result in significant impact to land use and planning if either of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met:

- 1) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan,

LCP, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

2) Would the project conflict with any applicable HCP or NCCP?

Based on the Initial Study prepared for the LMR project, it was determined that the project would not result in the physical division of an established community so no further analysis of this topic is warranted within this EIR.

3.9.4 Impact Analysis

3.9.4.1 *Proposed Project*

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impacts

As discussed above, the Project sites cover multiple jurisdictions. All of the plans identified above were reviewed for relevance, and the proposed Project sites were reviewed for consistency with relevant plans, policies, and regulations, as indicated in Table 3.9-4.

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
AGH	Agoura Hills	City of Agoura Hills General Plan Update Los Angeles County General Plan 2035	Open Space Deed Restricted	Open Space Deed Restricted	60 feet	Yes, exceeds height restriction by up to 10 feet ¹
AJT	AeroJet	City of Chino Hills Draft 2014 General Plan Update Los Angeles County General Plan 2035	Undesignated	Rural Residential	70 feet	No
ASD	Auto Square Drive	Cerritos General Plan Los Angeles County General Plan 2035	ADP 5 Cerritos Auto Square	Auto Mall / Restricted Commercial	85 feet	No
BJM	Black Jack Peak	Los Angeles County General Plan 2035	Open Space	Open Space	N/A	No

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
BUR	Burnt Peak	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
BUR1	Burnt Peak-1	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
BUR2	Burnt Peak-2	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
BUR3	Burnt Peak-3	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
CPK	Castro Peak	Los Angeles County General Plan 2035	Public and Semi-Public Facilities	Light Agriculture	N/A	No

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
DPK	Dakin Peak	Los Angeles County General Plan 2035	Open Space	Open Space	N/A	No
ENC1	Encinal 1 (Fire Camp 13)	City of Calabasas 2030 General Plan Los Angeles County General Plan 2035	Public and Semi-Public Facilities	Light Agriculture	N/A	No
ENT	Entrada Tank Site	Los Angeles County General Plan 2035	Hillside Mountainous	Open Space	N/A	Yes
FRP	Frost Peak (Upper Blue Ridge)	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}
FTP	Flint Peak	Glendale General Plan Los Angeles County General Plan 2035	Very Low Density Residential/ Open Space	Residential Open Space	32 feet. Additional height requires Planning Commission approval	Inconsistent with County plan. Also inconsistent with city zoning ordinance; 180-foot tower exceeds height restriction
GMT	Grass Mountain	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Backcountry	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}
GRM	Green Mountain	Topanga State Park General Plan	Wildlands	N/A	N/A	No

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
H-17A	H-17A	Whittier General Plan Los Angeles County General Plan 2035	Park	Hillside Residential	Maximum building height (30 feet), or 70 feet with conditional use permit	Inconsistent with County plan. Also inconsistent with city zoning ordinance; 180- foot tower exceeds height restriction
H-69B	H-69B	Los Angeles County General Plan 2035	Mountain Lands (RL20)	Light Agriculture	N/A	No
JOP	Josephine Peak	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Backcountry Motorized Use Restricted	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
JPK	Johnstone Peak-1	City of San Dimas General Plan Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Experimental Forest; designated communications site	Watershed	12 feet; 30 feet if designed as public art	Yes, San Dimas policy is to preserve existing ridgelines; zoning permits when building mount, designed as public art, or maximum height of 12 feet – proposed 180- foot tower exceeds allowable height; requires USFS special use permit ¹

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
JPK2	Johnstone Peak-2	City of San Dimas General Plan Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Experimental Forest; designated communications site	Watershed	12 feet; 30 feet if designed as public art	Yes, San Dimas policy is to preserve existing ridgelines; zoning permits when building mount, designed as public art, or maximum height of 12 feet – proposed 180-foot tower exceeds allowable height; requires USFS special use permit ¹
LACF072	County FS 72	Los Angeles County General Plan 2035	Public and Semi-Public Facilities	Light Agriculture	N/A	No
LACFCP08	Camp 8	Los Angeles County General Plan 2035	Open Space - Parks	Light Agriculture	N/A	No
LACFCP09	County CP 9	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Backcountry	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
LACFCP11	County CP 11	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface	Watershed Heavy Agriculture	N/A	No, but requires USFS special use permit ^{1,2}
LARICSHQ	LA-RICS Headquarters	City of Monterey Park General Plan Los Angeles County General Plan 2035	Commercial	Commercial and Services	N/A	No

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
LEPS	Lower Encinal Pump Station	City of Malibu General Plan Los Angeles County General Plan 2035	Rural Residential	Rural Residential	28 feet	Consistent with plans, but not with zoning ordinance; proposed 70-foot monopole exceeds allowable height
LPC	Loop Canyon	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Backcountry; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
MMC	Mount McDill	Palmdale General Plan Los Angeles County General Plan 2035	Public Facility	Public Facilities	45 feet, 65 feet with conditional use permit	Inconsistent with County plan. Also inconsistent with city zoning ordinance; proposed 180-foot lattice tower exceeds allowable height
MML	Magic Mountain Link	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Backcountry; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
MTL2	Mount Lukens-2	Los Angeles County General Plan 2035 and City of Los Angeles General Plan	Open Space – National Forest; Forest Plan land use designation is Back Country Motorized Use Restricted; designated communications site	Open Space	N/A	No, but requires USFS special use permit ^{1, 2}
OAT	Oat Mountain-1	Los Angeles County General Plan 2035	Non-Urban	Heavy Agriculture	N/A	Yes
PASPD01	Pasadena Police Dept.	The City of Pasadena Comprehensive General Plan Los Angeles County General Plan 2035	Central District Specific Plan	CD-2 Central District	50 feet	Inconsistent with County plan. Also inconsistent with city zoning ordinance; proposed 70-foot monopole exceeds allowable height
PDC	Pacific Design Center	West Hollywood General Plan 2035 Los Angeles County General Plan 2035	C4 (Unknown)	Pacific Design Center Specific Plan	N/A	No
PHN	Puente Hills	Los Angeles County General Plan 2035	Open Space	Light Agriculture	N/A	Yes
PMT	Pine Mountain	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Back Country; designated communications site for government use only	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
PWT	Portshead Tank	City of Malibu General Plan Los Angeles County General Plan 2035	Public Open Space	Public Open Space	28 feet	No
RIH	Rio Hondo	Los Angeles County General Plan 2035	Open Space	Open Space	N/A	Yes
SDW	San Dimas	City of San Dimas General Plan Los Angeles County General Plan 2035	Single Family Residential Very Low	Specific Plan 5	12 feet; 30 feet if designed as public art	Yes, San Dimas Specific Plan 5 provision for existing communication facilities is for maximum structure height of 100 feet; proposed 180-foot tower exceeds allowable height. Inconsistent with County plan.
SGH	Signal Hill	City of Signal Hill General Plan Los Angeles County General Plan 2035	Low Density Residential	Hilltop Specific Plan District	N/A	Inconsistent with County plan ¹
SIM	Simpsons' Building	Los Angeles County General Plan 2035	Specific Plan	Specific Plan	N/A	No
SPN	Saddle Peak	Los Angeles County General Plan 2035	Mountain Lands (RL20)	Light Agriculture	N/A	No
SUN	Sunset Ridge	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Experimental Forest; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
SUN2	Sunset Ridge-2	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Experimental Forest; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
TMT	Table Mountain	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1,2}
TOP	Topanga Peak	Los Angeles County General Plan 2035	Public and Semi-Public Facilities	Light Agriculture	N/A	No
TPK	Tejon Peak	Los Angeles County General Plan 2035	Rural	Watershed	N/A	Yes
TWR	Tower Peak	Los Angeles County General Plan 2035	Open Space	Open Space	N/A	No
VPK	VPK	Glendale General Plan Los Angeles County General Plan 2035	Recreational/Open Space	Special Recreation	N/A	Inconsistent with County plan
WAD	Walker Drive	City of Beverly Hills General Plan Los Angeles County General Plan 2035	Single Family Residential – Low Density	One Family Residential Zone	N/A	Inconsistent with County plan

Table 3.9-4: Planning and/or Zoning Designations for Proposed Project Sites

Site ID	Site Name	General Plan Name	General Plan Designation	Zoning Designation	Height Restriction	Inconsistent with Plans or Policies
WMP	Whitaker Middle Peak	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}
WS1	100 Wilshire	City of Santa Monica General Plan Los Angeles County General Plan 2035	OSD (unknown)	Residential-Visitor Serving Commercial District	N/A	No
WTR	Whittaker Ridge	Los Angeles County General Plan 2035	Open Space – National Forest; Forest Plan land use designation is Developed Area Interface; designated communications site	Watershed	N/A	No, but requires USFS special use permit ^{1, 2}
ZHQ	Zuma Life Guard HQ	City of Malibu General Plan; Downtown Specific Plan Los Angeles County General Plan 2035	Public Open Space	Public Open Space	28 feet	No

Notes:

N/A = Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit)

¹ – Telecommunications uses presently on site

² – Angeles National Forest would require special use authorization; sites on USFS land are noted within Los Angeles County zoning ordinances and may require a County issued Conditional Use Permit, if applicable

Sources: See Table 3.9-3 for a list of the sources used

Proposed Project sites may be inconsistent with current land use plans where (i) new structures would be constructed at locations where telecommunications structures do not currently exist, (ii) the LMR structures would be taller than existing structures, or (iii) an existing structure may be increased in

height. As noted in Section 3.9.1.2, the Authority is not subject to certain local land-use plans, policies, and regulations, per the doctrine of intergovernmental immunity. Therefore, local land use restrictions may not be applicable but are discussed here to assist in determining whether the proposed Project may conflict with nearby land uses, which could affect the analysis of whether the proposed Project would result in potentially significant environmental impacts.

Project sites proposed to use existing structures at existing communications sites would not result in changes to land use that would conflict with land use plans, policies, or regulations. Where antennas are being added to existing towers, monopoles, or roof tops, the Project would not result in new structures that may conflict with land use plan height restrictions. Sites AJT, LARICSHQ, PDC, SGH, SIM, WAD, and WS1 use existing telecommunications sites and do not convert land for a new purpose. Consequently, no impact would occur at these sites.

As indicated in Table 3.9-4, a review of city and county general plans and zoning ordinances indicate that Sites AGH, FTP, H-17A, JPK, JPK2, LEPS, MMC, PASPD01, and SDW are inconsistent with local zoning ordinances regarding height restrictions. Additionally, Sites JPK and JPK2 are inconsistent with the City of San Dimas goal of preserving the integrity of the foothills through Open Space Objective 5.1 to preserve existing ridgelines and Policy 5.1.2 to protect views and viewsheds of the foothills. Sites AGH, ENT, FTP, H-17A, MMC, OAT, PASPD01, PHN, RIH, SDW, SGH, TPK, VPK, and WAD are inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and/or the policy to protect areas that have significant natural resources. As discussed in this EIR in Sections 3.5 (Geology/Soils), Section 3.7 (Hazards and Hazardous Materials), Section 3.3 (Biological Resources), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant. Because no physical impact would occur as a result of an inconsistency between the proposed Project and the plans identified in Table 3.9-4, the plan inconsistency is not considered a significant impact. Similarly, all sites listed in Table 3.9-4 that are consistent with local plans, policies, and ordinances would have no significant impact.

Sites BUR, BUR1, BUR2, BUR3, FRP, GMT, JOP, JPK, JPK2, LACFCP09, LACFCP11, LPC, MML, MTL2, PMT, SUN, SUN2, TMT, WMP, and WTR are within Angeles National Forest. Of these, sites GMT, JOP, LACFCP09, LACFCP11, and PMT are in locations not presently designated as a communications site in the Forest Plan. The Forest Plan does not indicate if communication facilities outside designated communication sites are compatible or incompatible, but it does not prohibit such use. As noted in Section 3.9.1.2, the Southern California National Forests have established design criteria for communication towers, including a criterion that new structures should not be taller than existing structures. For proposed sites at designated communications sites (including BUR, BUR1, BUR2, BUR3, FRP, LPC, MTL-2, SUN, SUN2, TMT, WMP, and WTR), the Authority requested information from representatives of the Angeles National Forest regarding the height of existing structures; but this information has not been received and communications plans are not publically available. Coordination with Angeles National Forest is ongoing, and the final determination of consistency would be made by the USFS in connection with their consideration of the Authority's application to construct all sites on

USFS land. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed Project and an applicable plan, and this is not considered a significant impact.

As noted in Table 3.9-2, sites BJM, CPK, DPK, ENC1, H-69B, LACF072, LACFCP08, LEPS, PWT, SPN, TOP, TWR, WS1, and ZHQ are within the coastal zone; and most are subject to land use plans adopted by the CCC. Table 3.9-5 identifies characteristics of the site locations, proposed antennas and support structures, and potential conflicts with coastal zone planning documents by coastal zone. Conformance with coastal zone land use plans largely depends on structure height and other design elements for making the equipment blend visually into the environmental setting. The final determination of consistency for sites CPK, H-69B, LACFCP08, SPN, and TOP would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. At sites BJM, CPK, DPK, PWT, SPN, TOP, TWR, WS1, and ZHQ, no physical impact would occur as a result of an inconsistency between the proposed Project and an applicable plan, and this is not considered a significant impact.

Sites ENC1, H-69B, LACF072, and LACFCP08 would exceed the allowable height along a designated scenic route established by the LCP for the Santa Monica Mountains Coastal Zone. While inconsistency with a plan is not a physical impact on the environment, Section 3.1 (Aesthetics) of this EIR has taken these inconsistencies into account for purposes of analyzing the proposed Project's impact on visual resources and only Site H-69B was found to have a significant impact.

Table 3.9-5: Local Coastal Program Consistency Evaluation

Site ID	Site Name	Site Characteristics and Coastal Zone Policies of Relevance
Santa Monica Mountains Coastal Zone		
CPK	Castro Peak	<ul style="list-style-type: none"> Existing communication facilities on site Proposed whip and microwave antennas mounted on proposed 180-foot lattice tower Along an adopted significant ridgeline Policy CO-136 prohibits development on designated significant ridgelines. Development on ridgelines other than significant ridgelines is not allowed if it is feasible to avoid developing on the ridgeline. If it is infeasible to avoid developing on a ridgeline (not designated as significant), the policy limits maximum height to 18 feet above existing or finished grade, whichever is lower.
ENC1	Encinal 1 (Fire Camp 13)	<ul style="list-style-type: none"> Some facilities on site, but not communications facilities Proposed whip and microwave antennas mounted on proposed 180-foot lattice tower

Table 3.9-5: Local Coastal Program Consistency Evaluation

Site ID	Site Name	Site Characteristics and Coastal Zone Policies of Relevance
		<ul style="list-style-type: none"> • Along Encinal Canyon Road, a designated scenic route • Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along scenic routes • Policy CO-152 indicates wireless telecommunication facilities along scenic routes should be collocated where feasible and made to blend into the landscape
H-69B	H-69B	<ul style="list-style-type: none"> • No communication facilities identified on site • Proposed whip and microwave antennas mounted on proposed 180-foot lattice tower • Within 500 feet of Saddle Peak Road, a designated scenic route • Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along scenic routes • Policy CO-152 indicates wireless telecommunication facilities along scenic routes should be collocated where feasible and made to blend into the landscape • Along an adopted significant ridgeline • Policy CO-136 prohibits development on designated significant ridgelines and for ridgelines other than significant ridgelines limits maximum height to 18 feet above existing or finished grade, whichever is lower, assuming an alternative building site not on the ridgeline is not feasible
LACF072	County FS 72	<ul style="list-style-type: none"> • Some facilities on site, but not communications facilities • Proposed whip and microwave antennas mounted on proposed 70-foot monopole • Along Decker Road, a designated scenic route • Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along scenic routes • Policy CO-152 indicates wireless telecommunication facilities along scenic routes should be collocated where feasible and made to blend into the landscape
LACFCP08	Camp 8	<ul style="list-style-type: none"> • Some facilities on site, but not communications facilities • Proposed whip and microwave antennas mounted on proposed 70-foot monopole • Within 1,100 feet of Las Flores Canyon Road, a designated scenic route • Along an adopted significant ridgeline • Policy CO-136 prohibits development on designated significant ridgelines and for ridgelines other than significant ridgelines limits maximum height to 18 feet above existing or finished grade, whichever is lower, assuming an alternative building site not on the ridgeline is not feasible
SPN	Saddle Peak	<ul style="list-style-type: none"> • Expansion of an existing communications facility • Proposed whip and microwave antennas to be mounted to proposed

Table 3.9-5: Local Coastal Program Consistency Evaluation

Site ID	Site Name	Site Characteristics and Coastal Zone Policies of Relevance
		180-foot lattice tower <ul style="list-style-type: none"> • Along an adopted significant ridgeline • Policy CO-136 prohibits development on designated significant ridgelines and for ridgelines other than significant ridgelines limits maximum height to 18 feet above existing or finished grade, whichever is lower, assuming an alternative building site not on the ridgeline is not feasible
TOP	Topanga Peak	<ul style="list-style-type: none"> • Some facilities on site, but not communications facilities • Proposed whip and microwave antennas mounted on proposed 180-foot lattice tower • Within 400 feet of Saddle Peak Road, a designated scenic route • Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along scenic routes • Policy CO-152 indicates wireless telecommunication facilities along scenic routes should be collocated where feasible and made to blend into the landscape • Along an adopted significant ridgeline • Policy CO-136 prohibits development on designated significant ridgelines and for ridgelines other than significant ridgelines limits maximum height to 18 feet above existing or finished grade, whichever is lower, assuming an alternative building site not on the ridgeline is not feasible
Malibu Coastal Zone		
	Common to All	<ul style="list-style-type: none"> • Per Policy 5.59, new communication transmission lines shall be sited underground except when it contributes to geologic hazards • Communication facilities are provided for as a conditional use in all land use designations; collocation is required where feasible • Per Policy 6.7, the maximum allowable height shall be 18 feet above existing or finished grade, whichever is lower, and that new development blend in with natural materials on the site
LEPS	Lower Encinal Pump Station	<ul style="list-style-type: none"> • Some facilities on site, but not communications facilities • Proposed whip and microwave antennas mounted on proposed 70-foot monopole. • Within 500 feet of Encinal Canyon Road, a scenic road; and places visible from scenic roads are considered scenic areas • Per Policy 6.5, new development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads to the maximum feasible extent
PWT	Portshead Tank	<ul style="list-style-type: none"> • No communication facilities identified on the site, but an approximately 24-foot-tall storage tank is present • Proposed whip antennas mounted on proposed 28-foot monopole • Approximately 800 feet from Kanan Dume Road, a designated scenic road

Table 3.9-5: Local Coastal Program Consistency Evaluation

Site ID	Site Name	Site Characteristics and Coastal Zone Policies of Relevance
		<ul style="list-style-type: none"> Chapter 6 of the Land Use Plan (adopted September 13, 2002) identifies a requirement that new development not be visible from scenic roads Terrain, existing vegetation, and the existing storage tank may screen the proposed communication facilities from view
ZHQ	Zuma Life Guard HQ	<ul style="list-style-type: none"> Site is fully developed, including roof-mounted communication facilities Proposed whip and microwave antennas mounted on proposed 28-foot monopole Adjacent to Pacific Coast Highway Per Policy 6.36, telecommunications facilities along Pacific Coast Highway shall place support facilities underground, where feasible
Santa Catalina Island Coastal Zone		
	Common to All	<ul style="list-style-type: none"> Per Section 30253, plan policies and recommended actions for new development include discouraging the siting of communications facilities in high-visibility locations; priorities include the land/water interface, ridgelines, distinctive geologic features, native trees and vegetation, natural streams, and riparian habitats.
BJM	Black Jack Peak	<ul style="list-style-type: none"> Existing communication facilities on site Proposed whip and microwave antennas mounted on proposed 180-foot high lattice tower
DPK	Dakin Peak	<ul style="list-style-type: none"> Existing communication facilities adjacent to site Proposed whip and microwave antennas to be mounted to proposed 200-foot lattice tower
TWR	Tower Peak	<ul style="list-style-type: none"> Existing communication facilities on site Proposed whip and microwave antennas mounted on new 100-foot lattice tower
City of Santa Monica		
WS1	100 Wilshire	<ul style="list-style-type: none"> Existing building on site; LMR equipment would be on rooftop Proposed whip and microwave antennas to be façade-mounted to existing penthouse Located along scenic corridors: Ocean Avenue and Wilshire Boulevard
Sources:		
California Conservation Easement Database 2014		
City of Malibu. 2002		
City of Santa Monica, Planning & Community Development. 2014		
City of Santa Monica, California 1992		
County of Los Angeles, Department of Regional Planning. 2014b		
Los Angeles County Department of Regional Planning 1983		

Two sites, LACFCP08 and PWT, are on land within the jurisdiction of the National Park Service as well as being within the Santa Monica Mountains Coastal Zone. In accordance with the Superintendent's Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority (NPS 2014b), construction of a structure on NPS land requires a permit from the Superintendent. The final determination of consistency for sites LACFCP08 and PWT would be made by NPS. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed Project and an applicable plan, and this is not considered a significant impact.

Individual site analyses are provided in Chapter 4.

Mitigation Measures

None required.

Operation Impacts

Impacts from operation of the proposed Project would be the same as those described for construction.

Mitigation Measures

No mitigation would be required during the operations phase.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

As indicated in Table 3.9-2, no NCCP and one HCP apply to proposed Project sites in the Project area. Proposed Project Site MMC is on land subject to the West Mojave HCP.

No other proposed Project sites evaluated in this EIR are on land subject to an NCCP or HCP.

Construction Impacts

Site MMC contains existing antenna support structures. No impacts to conservation resources are expected or identified in the West Mojave HCP.

The West Mojave HCP does not cover communication sites and does not preclude access and opportunities to build or maintain permitted communications sites. As a result, the proposed Project sites would not conflict with land use policies of the West Mojave HCP. No land use impacts would occur from placing proposed Project sites on land subject to the West Mojave HCP.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Impacts from operation of the Project sites would be the same as described for construction. No impacts would be expected from operation of the Project.

Mitigation Measures

No mitigation measures are required.

3.9.4.2 No Project Alternative

With the No Project Alternative, the proposed Project communications sites would not be constructed, and equipment would not be added to existing communications sites. To the extent that other land uses are found to be compatible with the existing conditions at the proposed sites, the land would remain available for development of other facilities.

3.9.5 Cumulative Impacts

3.9.5.1 Geographic Extent

The geographic extent for the analysis of cumulative impacts associated with land use includes projects with the boundaries of proposed Project sites or within 100 feet of the perimeter of the site boundary (see Chapter 4 for site boundary maps). Most land use effects are associated with direct physical use of the site, although immediately adjacent land uses may be affected by a change in use of a neighboring property. Zoning ordinances account for compatibility of adjacent land uses when establishing zoning maps. Consequently, when a telecommunications structure is an allowable use for the zone in which it is located, it is considered compatible with the goals of adjacent zones even if a telecommunications structure may be prohibited in the adjacent zone.

3.9.5.2 Existing Cumulative Conditions

Table 2.7-1 in Chapter 2 lists proposed projects in the vicinity of proposed Project sites. Those that are within the geographic extent for the land use analysis include four LA-RICS LTE sites, one proposed LA-RICS LMR site that was previously approved, two communications towers proposed by other entities, and the proposed replacement of a gas turbine-driven compressor station at the Aliso Canyon natural gas storage field. Past projects and those that may currently be under development have been through a land use planning and permitting process and were determined to be compatible with city or county General Plans, zoning ordinances, or other plans applicable to the land use management agency.

Proposed sites in close proximity to other proposed projects include Sites MML, OAT, PASPD01, PDC, PHN, RIH, VPK, and WS1.

The criteria by which land use impacts would be considered cumulatively significant are the same as those considered for the proposed Project and discussed in Section 3.9.4.1.

3.9.5.3 Cumulative Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local

coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Sites PHN and VPK would be collocated on sites with existing telecommunication facilities. If associated facilities are needed, such as the addition of an equipment shed or power lines, the facilities would be within the perimeter of the land allocated as a telecommunications facility; and the land use would not change. Table 3.9-4 shows no inconsistencies with existing plans, policies, or zoning ordinances; and, with no change in land use, no cumulative land use impact would occur at these sites.

Site MML is an alternate to Site MAM, and only one of these two LA-RICS LMR sites would be developed; therefore, no cumulative effect is associated with these two proposed sites.

Sites PASPD01 and PDC are proposed in close proximity (typically adjacent) to an approved LA-RICS LTE site. Site PDC is a roof mount; whereas, the LTE site is a monopole. Alternatively, Site PASPD01 is proposed as a monopole, while the LTE site is a roof mount. No inconsistencies with land use plans, policies, or ordinances exist for Site PDC or the adjacent LTE sites. The City of Pasadena zoning ordinance allows for telecommunications facilities but has a height restriction of 50 feet in the zoning ordinance. Per the doctrine of intergovernmental immunity, the zoning ordinance would not apply to Site PASPD01 or the adjacent proposed LTE site. Both of these sites are in urban (developed) environments. While the LMR sites would contribute to the overall development of the site, the nature of the developed land use would not change and the cumulative land use impact would be less than significant.

Site OAT includes two existing lattice towers, so the proposed tower would not change the current land use. The compressor station replacement project in near proximity to this site would contribute to the ongoing development of the area and may contribute to ground disturbance; but the cumulative effect on land use would be minimal, as the consolidation of development in one area has fewer effects than the same amount of development dispersed over a larger area. No conflicts with land use plans, policies, or regulations would occur. The cumulative effect on land use would be less than significant.

Site RIH is proposed within the proximity of an existing antenna farm with five existing structures and one additional communications tower proposed in addition to the proposed Project site. The proposals do not conflict with land use plans, policies, or regulations. The immediate area is already allocated for antennas, so the land use would not change, and there would be no cumulative effect.

Site WS1, a proposed roof mount on an existing 320-foot building located within the City of Santa Monica Coastal Zone, is the only site within a coastal zone with another antenna proposed nearby. The proposed roof mount on an existing building would eliminate the loss of the land for other uses and would minimize the potential for conflicts with the LCP goals and policies addressing preservation of views. While the project description for the proposed MediaFLO USA Inc. communications tower is unknown, this would likely be a building mount, based on the development in the immediate area. Consequently, there would be no cumulative effect on the coastal zone.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

The only proposed Project site within land subject to an HCP is Site MMC and no other actions are proposed within the geographic extent of the cumulative analysis for land use. No sites were identified on land subject to an NCCP. Consequently, no cumulative effect on an HCP or NCCP would occur.

3.10 Noise

This section evaluates noise impacts that would result from construction and operation of the proposed Project sites. It discusses the existing noise environment at and around the Project area, as well as the regulatory framework for regulation of noise. It also analyzes the proposed Project's effect on the existing ambient noise environment during construction and operation. The analysis in this section is based on a comprehensive review of existing documentation for the Project area; estimates of ambient noise conditions based on land use type and population density; and applicable policies, standards, and regulations. The section addresses noise and vibration impacts on humans, as well as vibration effects on structures. Noise effects on wildlife are addressed in Section 3.3.

3.10.1 Environmental Setting

The environmental setting explains the fundamentals of noise and groundborne vibration and describes the existing noise conditions including noise-sensitive receivers identified in the Project area.

3.10.1.1 Fundamentals of Noise

Noise can be defined as unwanted sound. Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. The sound pressure level or decibel (dB) scale is the most common descriptor used to characterize the loudness of an ambient sound level. In general, human sound perception is such that a change in sound level of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving sound level. The human ear is not equally sensitive to all frequencies in the entire spectrum, so noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called "A-weighting," or "dBA." The A-weighted sound level is widely accepted by acousticians as a proper unit for describing environmental noise. Table 3.10-1 describes typical A-weighted noise levels for various noise sources.

Table 3.10-1: Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock band
Jet fly-over at 1000 feet		
	100	
Gas lawn mower at 3 feet		
	90	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	70	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	60	
		Large business office
Quiet urban daytime	50	Dishwasher next room

Table 3.10-1: Typical A-Weighted Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night
	20	
		Broadcast/recording studio
	10	
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013

To characterize the noise environment in a given area, the following noise descriptors are commonly used:

- Maximum Sound Level (L_{max}): The maximum sound level measured during the measurement period
- Minimum Sound Level (L_{min}): The minimum sound level measured during the measurement period
- Equivalent Sound Level (L_{eq}): The equivalent steady state sound level that in a stated period of time would contain the same acoustical energy
- Day/night Average Noise Level or Community Noise Equivalent Level (L_{dn} or CNEL): Both descriptors provide the same 24-hour level with 10 dBA applied to the actual noise level during the hours from 10:00 p.m. to 7:00 a.m. The CNEL also requires that 5 dBA be applied to the actual noise level during the hours from 7:00 p.m. to 10:00 p.m. The applied increments take into account a person's increased sensitivity to noise during these periods.

3.10.1.2 Sound Propagation

When sound propagates over a distance, it changes in level and frequency content. The manner in which noise reduces with distance depends on the following factors.

Geometric Spreading

Sound from a localized source (i.e., a point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 decibels for each doubling of distance from a point source. Roadways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source

propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.

Ground Absorption

The propagation path of noise from a roadway to receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective-wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground-attenuation value of 1.5 decibels per doubling of distance is normally assumed. When added to the spherical spreading, the excess ground attenuation results in an overall drop-off rate of 7.5 decibels per doubling of distance.

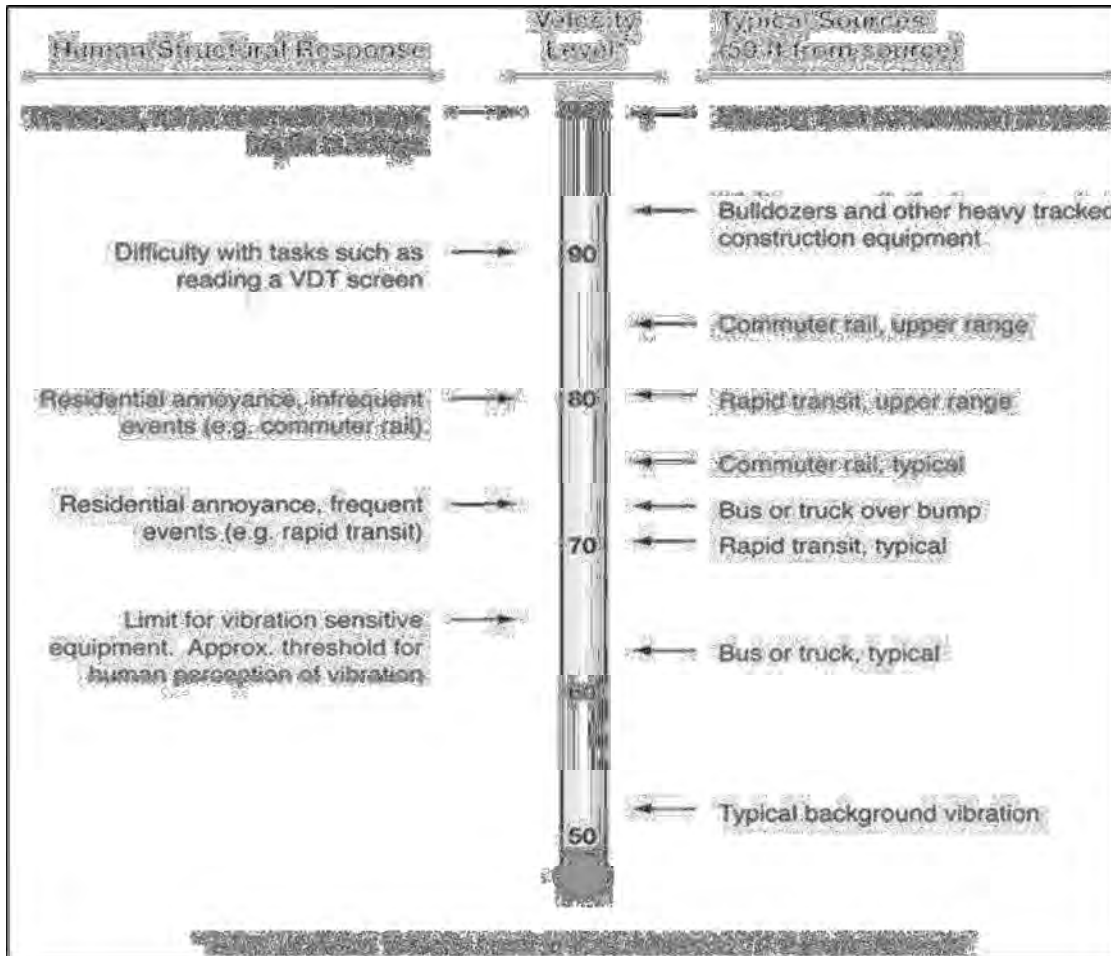
Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dB of noise reduction. Taller barriers provide increased noise reduction. Vegetation between the noise source and receiver is rarely effective in reducing noise because it does not create a solid barrier.

3.10.1.3 Fundamentals of Groundborne Vibration

In contrast to airborne noise, groundborne vibration (GBV) is not a phenomenon experienced by most people on a daily basis. Typical outdoor sources of perceptible GBV are construction equipment and traffic on rough roads. Figure 3.10-1 depicts the typical levels of GBV. The effects of GBV include feelable movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Groundborne noise (GBN) is the rumbling sound caused by the vibration of room surfaces. The annoyance potential of GBN is usually characterized with the A-weighted sound level. GBV is almost never annoying to people who are outdoors. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB).

Figure 3.10-1: Typical Levels of Groundborne Vibration



Source: FTA, 2006.

3.10.1.4 Existing Noise Conditions

Existing noise sources in the Project area generally include transportation noise (e.g., vehicle traffic, aircrafts, transit), mechanical equipment (e.g., air conditioning, mechanical equipment), and natural sources (e.g., wind, birds, insects).

Identification of Sensitive Receivers

Some land uses are considered more sensitive to ambient noise and groundborne vibration levels than others. People in residences, motels and hotels, schools, libraries, churches, hospitals, nursing homes, auditoriums, natural areas, and parks and outdoor recreation areas are generally more sensitive to noise than are people at commercial and industrial establishments. Consequently, the noise standards for sensitive land uses are more stringent than for those at less sensitive uses. The number and type of noise sensitive uses within the Project area varies depending upon the location and degree of development in the area. Some receivers are located adjacent to the proposed Project sites, while

others are located up to 500 feet away from the proposed sites. Chapter 4 details the type and distance receivers are located from each proposed site. The distance from the Project sites not immediately adjacent to noise-sensitive receivers was measured from property boundary to property boundary and, therefore, represents a conservative distance. The actual distance would likely be greater, as Project-related construction and operational activity and sensitive receivers are generally not located on the actual property boundary. Receivers located adjacent to the proposed sites were assumed to be a minimum of 25 feet from any proposed activity to account for a conservative setback from the property boundary of the Project site activity and the receiver, respectively. Most of the relevant local noise ordinances do not specify a distance at which noise-sensitive receivers should be assessed, but a few do reference 500 feet as the distance for assessing noise-sensitive receivers and potential noise impacts. The highest potential continuous noise levels associated with the Project would occur when emergency diesel generators are needed for periods of more than 24 hours. As discussed in greater detail in Section 3.10.4, these generators typically produce a maximum of 68 dBA at a reference distance of 21 feet, or 58 dBA if housed in a solid enclosure. At approximately 500 feet from the source, these levels would be reduced to approximately 41 dBA (near the lowest ambient noise level at the proposed sites) even if ground absorption or natural/human-made shielding effects are not taken into account; therefore, a distance of 500 feet from the Project sites was used to identify potential noise-sensitive receivers with the impact analyses focusing on the closest receiver(s).

Ambient Noise Levels

Ambient noise levels within the Project area vary depending on the location, degree of development, and general human activity in the area. Due to the numerous noise-sensitive sites in the study area, ambient noise levels were determined based on estimating existing noise exposure as defined in the *Federal Transit Administration Transit Noise and Vibration Impact Assessment* manual (FTA 2006). *Table 5-7 Estimating Existing Noise Exposure for General Noise Assessment* in the manual lists ambient noise levels based on distance to roadways and various population densities (from less than 100 people per square mile to 30,000+ people per square mile) that were developed by USEPA (USEPA 1974). For noise-sensitive sites located near airports, noise contours established for the airport were reviewed and referenced, where applicable. The proposed Project sites are located in areas ranging from rural undeveloped lands (less than 100 people per square mile) to heavily developed urban areas (30,000+ people per square mile). In addition, in heavily developed urban areas where sites are located near moderately traveled roadways, the distance to roadways was used to estimate noise exposure. The ambient noise levels throughout the Project area, based on FTA guidance described above, are estimated to range between 45 dBA and 65 dBA.

3.10.2 Regulatory Setting

3.10.2.1 *Federal Regulatory Setting*

In 1974, the USEPA published information on negative effects of noise and identified indoor and outdoor noise limits that protect public health and welfare. This document provides information for state and local governments to use in developing their own noise standards. USEPA has indicated that

average acceptable day-night sound pressure levels fall in a range between 50 dBA in quiet suburban areas and 70 dBA in very noisy urban areas and has identified an L_{dn} of 55 dB on the A-weighted scale (dBA) would protect the public from outdoor activity interference. The Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment* guidelines for a general noise assessment indicate 90 dBA during daytime hours (7 a.m. to 10 p.m.) and 80 dBA during nighttime hours (10 p.m. to 7 a.m.) are thresholds where adverse community reaction could occur for construction activities on a temporary basis (FHA 2006). Although the FTA guidelines do not constitute regulatory requirements, these impact thresholds are referenced in this analysis to determine the potential significance of project construction noise impacts except in proposed locations where local ordinances apply.

3.10.2.2 State Regulatory Setting

The State of California has adopted noise standards in areas of regulation not preempted by the federal government. State standards regulate noise levels of motor vehicles, sound transmission through buildings, occupational noise control, and noise insulation. Title 24 of the California Code of Regulations (CCR), also known as the California Buildings Standards Code, establishes building standards applicable to all occupancies throughout the state. The CCR provides acoustical regulations for both exterior-to-interior sound insulation, as well as sound and impact isolation between adjacent spaces of various occupied units. Title 24 regulations generally state that interior noise levels generated by exterior noise sources shall not exceed 45 dBA Ldn/CNEL, with windows closed, in any habitable room for general residential uses.

Section 65302(f) of the California Government Code establishes the requirement that local land use planning jurisdictions prepare a General Plan. The Noise Element is a mandatory component of the General Plan. It includes general community noise guidelines developed by the California Department of Health Services and specific planning guidelines for noise/land use compatibility developed by the local jurisdiction. The State of California General Plan Guidelines (2003) lists the following guidelines for CNELs, originally developed by the California Department of Health Services, that are acceptable for use by local agencies:

- CNEL below 60 dBA: normally acceptable for low-density residential use
- CNEL of 55 to 70 dBA: conditionally acceptable for low-density residential use
 - CNEL below 65 dBA: normally acceptable for high-density residential use
 - CNEL of 60 to 70 dBA: conditionally acceptable for high-density residential, transient lodging, churches, educational and medical facilities
- CNEL below 70 dBA: normally acceptable for commercial uses
- CNEL below 77 dBA: conditionally acceptable for commercial uses
- CNEL below 75 dBA: normally acceptable industrial uses

- CNEL below 80 dBA: conditionally acceptable for industrial uses

“Normally acceptable” is defined as satisfactory for the specified land use, assuming that normal conventional construction is used in buildings. “Conditionally acceptable” may require some additional noise attenuation or special study. “Normally unacceptable” levels begin where the conditionally acceptable ranges end. The 60-dBA “normally acceptable” threshold listed above was used to establish a significance threshold for operational noise at the closest noise-sensitive receivers located within a 500-foot radius of Project sites.

3.10.2.3 Local Regulatory Setting

Local Jurisdictions

There are no federal or state standards for short-term noise exposure. Therefore, thresholds for construction noise are based upon local ordinances where they apply.

Project sites are proposed within portions of Los Angeles and San Bernardino counties and within the jurisdiction of 16 cities within these counties. Local noise regulations are summarized in Table 3.10-2. Some local ordinances have established a noise level threshold for construction activities. A vibration level threshold for construction activities has been established within unincorporated areas of Los Angeles County but not for any of the affected cities. All local ordinances either exempt noise and vibration from construction activities at all times or within specified hours of the day and/or night.

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
AGH(Agoura Hills)	Agoura Hills	Los Angeles	City of Agoura Hills; Article IX - Zoning; Chapter 6 - Regulatory Provisions, Part 2 - Special Regulations; Division 6 - Noise Regulations	none specified	Work must not occur between 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a legal holiday.	See noise restrictions
ASD (Auto Square Drive)	Cerritos	Los Angeles	Cerritos Municipal Code, Chapter 22.80 - Environmental Performance Standards, Section 480 - Noise	No noise shall be generated which causes the maximum sound level (noise level) at any point on property lines surrounding the premises on which noise is produced to exceed the background (ambient noise) including traffic noise by 5 dBA measured at the same point, or 50 dBA, whichever is greater in residential areas.	Exemptions. The provisions for noise limits shall not be applied to occasional use of equipment for maintenance of any lot or buildings or for building construction, for which a valid building permit has been issued, between the hour of 7 a.m. and 7 p.m. or for any public works activities or civic event which are authorized by the city.	No vibration (other than from transportation facilities or temporary construction work) shall be permitted which is discernible without instruments at the points of measurement specified in Section 22.80.210 . (Ord. 417 § 1 (part), 1972)
AJT(AeroJet)	Chino Hills	San Bernardino	City of Chino Hills, California, Code of Ordinances, Title 8 – Health and Safety,	none specified	Except when necessary for the immediate preservation of life, health, or property, no person shall construct, repair, remodel, demolish, or grade any real property or	See noise restrictions



Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
			Chapter 8.08 – Noise Control		structures thereon at any time other than between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays, excluding federal holidays.	
BJM (Black Jack Peak), BUR (Burnt Peak), BUR1 (Burnt Peak-1), BUR2 (Burnt Peak-2), BUR3 (Burnt Peak-3), CPK (Castro Peak), DPK (Dakin Peak), ENC1 (Encinal 1 (Fire Camp 13)), FRP (Frost Peak (Upper Blue Ridge)), GMT (Grass Mountain), H-69B (H-69B), JOP (Josephine Peak), LACF072 (County FS 72), LACFCP08 (Camp 8), LACFCP09 (County CP 9), LACFCP11 (County CP 11), LPC (Loop Canyon), MML (Magic Mountain Link), OAT	Unincorporated	Los Angeles	Unincorporated Los Angeles, California, Code of Ordinances, Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions	At residential structures maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment (1) daily, except Sundays and legal holidays, 7am to 8pm: Single Family Residential 75 dBA, multifamily residential 80 dBA, commercial 85 dBA; (2) daily 8pm to 7am and all day Sunday and legal holidays: single family residential 60 dBA, multifamily residential 64 dBA, commercial 70 dBA. At residential structures maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary	Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.	Operating or permitting the operation of any device that creates vibration which is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The perception threshold shall be a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
(Oat Mountain-1), PHN (Puente Hills), PMT (Pine Mountain), RIH (Rio Hondo), SIM (Simpsons' Building), SPN (Saddle Peak), SUN (Sunset Ridge), SUN2 (Sunset Ridge-2), TMT (Table Mountain), TOP (Topanga Peak), TPK (Tejon Peak), TWR (Tower Peak), WMP (Whittaker Middle Peak), and WTR (Whittaker Ridge)				equipment (1) daily, except Sundays and legal holidays, 7am to 8pm: Single Family Residential 60 dBA, multifamily residential 65 dBA, commercial 70 dBA; (2) daily 8pm to 7am and all day Sunday and legal holidays: single family residential 50 dBA, multifamily residential 55 dBA, commercial 60 dBA. At business structures maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment daily, including Sunday and legal holidays, all hours: 85 dBA.		

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
GRM(Green Mountain), MTL2 (Mount Lukens-2)	Los Angeles	Los Angeles	City of Los Angeles, California, Municipal Code, Chapter IV Public Welfare	none specified	No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.	See noise restrictions
FTP (Flint Peak), and VPK (VPK)	Glendale	Los Angeles	City of Glendale, California, Code of Ordinances, Title 8 Health and	none specified	It is unlawful for any person within a residential zone, or within a radius of five hundred feet therefrom, to operate equipment or perform any	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
			Safety, Chapter 8.36 Noise Control		outside construction or repair work on buildings, structures or projects within the city between the hours of seven p.m. on one day and seven a.m. of the next day or from seven p.m. on Saturday to seven a.m. on Monday or from seven p.m. preceding a holiday, as designated in Chapter 3.08 of this code, to seven a.m. following such holiday unless beforehand a permit therefor has been duly obtained from the building official.	
ENT (Entrada Tank Site)	Calabasas	Los Angeles	City of Calabasas Municipal Code; Chapter 17.20; Section 160 Noise	none specified	Noise sources associated with construction, including the idling of construction vehicles, are allowed provided such activities do not take place before seven a.m. or after six p.m. on any day except Saturday in which no construction is allowed before eight a.m. or after five p.m. No construction is allowed on Sunday's or federal holidays. These requirements may be modified by a conditional use permit.	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
H-17A (H-17A)	Whittier	Los Angeles	City of Whittier, California, Code of Ordinances, Title 8 Health and Safety, Chapter 8.32 Noise Control	none specified	Exemptions: Permitted construction during daytime hours.	Exemptions: Permitted construction during daytime hours.
JPK (Johnstone Peak-1), JPK2 (Johnstone Peak-2), and SDW (San Dimas)	San Dimas	Los Angeles	City of San Dimas, California, Municipal Code, Title 8 Health and Safety, Chapter 8.36 Noise Ordinance	none specified	It is unlawful for any person within a residential zone, or within a radius of five hundred feet therefrom, to operate equipment or perform any outside construction or repair work on any building, structure or project, or to operate any pile driver, steam shovel, pneumatic hammer, steam or electric hoist or other construction-type equipment or device between the hours of eight p.m. of one day and seven a.m. of the next day, at any time on Sunday, or at any time on any public holiday in such a manner that a reasonable person of normal sensitivity residing in the area is caused discomfort or annoyance unless beforehand a permit therefor has been duly obtained in accordance with the provisions of subsection B of this section. "Public	See noise restrictions



Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
					holiday,” as used in this section, means the day upon which each of the following holidays is recognized and celebrated as a holiday by the employees of the city: Independence Day, Labor Day, Veteran’s Day, Thanksgiving Day, Friday after Thanksgiving, Christmas Eve, Christmas, New Year’s Eve, New Year’s, Washington’s Birthday, Memorial Day or any other holiday recognized as such by the city council.	
LARICSHQ (LA-RICS Headquarters)	Monterey Park	Los Angeles	Title 9 Peace, Safety, and Morals, Chapter 9.53 Noise	None specified	Construction or demolition work is exempt if conducted between the hours of 7 a.m. and 7 p.m. on weekdays and the hours of 6 p.m. to 9 a.m. on Saturdays, Sundays, and holidays.	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
LEPS (Lower Encinal Pump Station), PWT (Portthead Tank), and ZHQ (Zuma Life Guard HQ)	Malibu	Los Angeles	City of Malibu, California, Municipal Code, Title 8 Health and Safety, Chapter 8.24 Noise	none specified	Construction: operating or causing the operation of any tools, equipment, impact devices, derricks or hoists used in construction, chilling, repair, alteration, demolition or earthwork, on weekdays between the hours of seven p.m. and seven a.m., before eight a.m. or after five p.m. on Saturday, or at any time on Sundays or holidays, except as provided in Section 8.24.060(D) is considered a violation of the code.	See noise restrictions
MMC (Mount McDill)	Palmdale	Los Angeles	City of Palmdale, California, Municipal Code, Title 8 Health and Safety, Chapter 8.28 Building Construction Hours of Operation and Noise Control	none specified	Except as otherwise provided in this chapter, no person shall perform any construction or repair work on any Sunday, or any other day after 8:00 p.m. or before 6:30 a.m., in any residential zone or within 500 feet of any residence, hotel, motel or recreational vehicle park. For the purposes of this section, construction and repair work includes work of any kind upon any building or structure, earth excavating, filling, or moving, and delivery, preparation or operation of construction equipment, materials or supplies where any of the foregoing entails	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
					the use of an air compressor, jack hammer, power-driven drill, riveting machine, excavator, semi-truck, diesel power truck, tractor, cement truck, or earth moving equipment, hand hammer, or other machine, tool, device or equipment which makes loud noise which disturbs the peace and quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness sleeping or residing in the area.	
PASPD01 (Pasadena Police Dept.)	Pasadena	Los Angeles	City of Pasadena, California, Code of Ordinances, Title 9 Public Peace, Morals and Welfare, Article IV Offenses Against Public Peace, Chapter 9.36 Noise Restrictions	85 dBA when measured within a radius of 100 feet from such equipment	No person shall operate any pile driver, power shovel, pneumatic hammer, derrick power hoist, forklift, cement mixer or any other similar construction equipment within a residential district or within a radius of 500 feet therefrom at any time other than from 7:00 a.m. to 7:00 p.m. Monday through Friday or from 8:00 a.m. to 5:00 p.m. on Saturday. Operation of any of the listed construction equipment is prohibited on Sundays and holidays. In addition, no person shall perform any construction or repair work on	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
					buildings, structures or projects within a residential district or within a radius of 500 feet therefrom in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance at any time other than from 7:00 a.m. to 7:00 p.m. Monday through Friday or from 8:00 a.m. to 5:00 p.m. on Saturday. Performance of construction or repair work is prohibited on Sundays and holidays.	
PDC (Pacific Design Center)	West Hollywood	Los Angeles	City of West Hollywood, California, Municipal Code, Title 9 Public Peace, Morals and Safety, Article 2 Miscellaneous, Chapter 9.08 Noise	none specified	Construction activities are prohibited between the hours of 7:00 p.m. and 8:00 a.m. on weekdays; or at any time on Saturdays (except, between the hours of 8:00 a.m. and 7:00 p.m., interior construction is permissible); or at any time on Sunday, New Year’s Day, Martin Luther King Day, President’s Day, Memorial Day, Independence Day, Labor Day, Veteran’s Day, Thanksgiving Day, the day after Thanksgiving and Christmas Day; all except as provided in subsection (d) of the code.	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
SGH (Signal Hill)	Signal Hill	Los Angeles	City of Signal Hill, California, Municipal Code, Title 9 Public, Peace, Morals and Welfare, Chapter 9.16 Noise	none specified	No person shall carry on any construction activities, including the erection, demolition, excavation, modification, alteration or repair of any building or structures, or any other activities creating construction noise as defined in this section other than between the hours of seven a.m. and six p.m. on weekdays, except as otherwise permitted in this section. It is the purpose of this section to promote quiet and peaceful residential areas by limiting construction activities which create disturbing noise to reasonable times and circumstances, but such limitations shall not apply where residences will not be affected, where individual homeowners are performing maintenance work, or to emergency circumstances.	See noise restrictions

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
WAD (Walker Drive)	Beverly Hills	Los Angeles	City of Beverly Hills; Title 5; Chapter 1; Article 2; Section 5	none specified	No person shall engage in construction, maintenance or repair work which requires a city permit between the hours of 6:00 P.M. and 8:00 A.M. of any day, or at any time on a Sunday or public holiday unless such person has been issued an afterhours construction permit.	See noise restrictions
WS1 (100 Wilshire)	Santa Monica	Los Angeles	City of Santa Monica, California, Municipal Code, Article 4 Public Welfare, Morals, and Policy, Chapter 4.12 Noise	For 15 minute continuous measurement period: Zone 1 (residential) 50 dBA Monday - Friday 10pm to 7am and Saturday and Sunday 10pm to 8am, 60 dBA Monday - Friday 7am to 10pm and Saturday and Sunday 8am to 10pm; Zone 2 (commercial) 60 dBA all days of week 10pm to 7am and 65 dBA all days of week 7am to 10pm.	No person shall engage in any construction activity during the following times anywhere in the City: before eight a.m. or after six p.m. on Monday through Friday; before nine a.m. or after five p.m. on Saturday; all day on Sunday; all day on New Year's Day, Martin Luther King's Birthday, President's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day, as those days have been established by the US of America. Except as set forth in subsection (d) of the code, the noise created by construction activity shall not cause: (1) The equivalent noise level to exceed the noise standards specified in Section 4.12.060 of the code, for	Vibration caused by construction activities is exempt.

Table 3.10-2: Summary of Local Regulations

Site ID(Name)	Jurisdiction		Noise Ordinance	Noise Level Threshold	Noise Restrictions	Vibration Restrictions
	City	County				
					<p>the noise zone where the measurement is taken, plus twenty dBA, or</p> <p>(2) A maximum instantaneous A-weighted, slow sound pressure level to exceed the decibel limits specified in Section 4.12.060 of the code for the noise zone where the measurement is taken plus forty dBA, for any period of time.</p>	

Airport Land Use Commissions

The Los Angeles County Airport Land Use Plan (ALUP) was adopted on December 19, 1991, and revised on December 1, 2004. Land Use Plans have also been completed for Cable Airport (adopted December 9, 1981) and General William J. Fox Airfield (adopted December 1, 2004). A land use plan was developed and approved for the Brackett Field Airport on December 9, 2015. No other approved airport land use plans are in the project area, although Los Angeles County has developed Airport Influence Area maps for other airports to show ALUP noise contours. Table 3.10-3 summarizes the proposed sites that are located within the airport influence areas or within 2.0 miles of these areas. Table 3.10-4 summarizes the Project sites within the vicinity of private airstrips.

Table 3.10-3: Project Sites Within or in the Vicinity of Airport Influence Areas

Name of Public Airport	Airport Land Use Plan	Project Sites within Airport Influence Area	Project Sites within 2 miles of Airport Influence Area
Brackett Field	Yes	None	SDW
Catalina	No	None	BJM
Long Beach	No	None	SGH
Santa Monica	No	None	WS1

Source: Los Angeles County GIS Data

Additional public airports are located within the project area: Agua Dulce, Whiteman, Burbank, Hawthorne, Compton, Torrance, El Monte, and Fox; however, no Project sites are located within 2.0 miles of these airport influence areas.

Table 3.10-4: Project Sites in the Vicinity of Private Airstrips and Heliports

Site ID	Name of Private Airstrip or Heliport
DPK	Pebble Beach Seaplane Base - L11
ENC1	Los Angeles County Fire Department Heliport
H-17A	Presbyterian Intercommunity Hospital Heliport
LACF072	Los Angeles County Fire Department Heliport
LACFCP08	Camp 8 Heliport
LACFCP11	Camp 11 Heliport
PASPD01	Huntington Memorial Hospital Heliport; Mesa Heliport; Super Bowl Heliport

Source: Los Angeles County Public Records

3.10.3 Significance Criteria

The proposed Project would result in significant impacts from noise if any of the following significance criteria, based on Appendix G of the CEQA Guidelines, are met:

- 1) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies
- 2) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels
- 3) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project
- 4) For a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels
- 5) For a project within the vicinity of a private airstrip, exposure of people residing or working in the project area to excessive noise levels

Based on the IS prepared for the LMR Project (Appendix A), it was determined that because operation of the Project would not include any activities or equipment usage that would result in a permanent increase in noise levels in the vicinity of a proposed Project site, no further analysis of whether the Project would result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project is warranted within this EIR.

3.10.4 Impact Analysis

3.10.4.1 ***Proposed Project***

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations. Additionally, in the following analysis, the EIR examines whether the proposed Project would result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or standards of other agencies, regardless of their applicability.

Construction Impacts

Construction of the proposed Project sites would generate noise from construction equipment usage, vehicle trips from construction workers, and supply trucks traveling to and from each proposed Project

site. Table 3.10-5 provides a summary of the construction phases and potential equipment that would be used under a maximum construction scenario. Additional detail on construction activities and methods is presented in Section 2.1.2.6.

Table 3.10-5: Summary of Construction Activities

Equipment Type	Specification (BHP)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Personnel and Tool Delivery						
F250 Antenna and Line Truck	306	4	0.067	30	600	Haul equipment.
F550 Civil Truck	306	1	0.067	30	150	Haul personnel.
Demolition						
Concrete Saw ²	81[27] ²	1	7	1	1	Break up existing concrete.
Mini Excavator	22.9	1	4	1	1	Cut and fill work.
Dump Truck	450	1	8	8	1	Haul off excess material.
2,000-gallon Water Truck	210	1	1	1	1	Dust control.
Site Preparation						
Mini Excavator	22.9	1	4	1	15	Cut and fill work.
Excavation						
Auger Drill Rig ²	205 [206] ²	1	3	1	2	Install fences, excavate foundation holes and bores.
Excavator	153	1	5	1	10	Trenching.
Cat Skid Steer	73	1	4	1	10	Move excavated soil on site.
2,000-gallon Water Truck	210	1	1	3	10	Dust control.
Pad Construction						
Concrete Truck	450	1	1	19	19	Pour concrete.
Monopole and Equipment Installation						
3-Ton Flatbed Truck	400	1	3	1	2	Haul materials and equipment.
250-Ton Crane	530	1	8	2	4	Monopole/shelter installation, tower assembly.
8,000-Pound Reach Fork	60	1	4	2	5	Access structures, string conductor, modify structure arms, tree trimming/removal, etc.
Portable Generator	84 [7] ²	1	6	1	10	Operate power tools.
^{1.} Maximum six-week total construction duration. ^{2.} Horsepower and usage data referenced from <i>Broadband Technology Opportunities Program Final Environmental</i>						

Table 3.10-5: Summary of Construction Activities

Equipment Type	Specification (BHP)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
<i>Assessment, Los Angeles Regional Interoperable Communications System (LA-RICS) Project (NTIA 2014).</i>						

Noise levels would vary depending on the type of equipment used, how and when it operates, and how well it is maintained. Demolition activities are anticipated to generate the loudest noise levels during construction. Therefore, predicted noise levels at each site were based on construction equipment that would be used during the demolition phase, which would include repeated use of a concrete saw and dump truck throughout a proposed 8-hour work day, use of a mini excavator for half of the proposed work day, and sporadic use of a water truck for about an hour as needed. The FHWA Roadway Construction Noise Model (RCNM), which estimates noise from various types of construction equipment, was used to assess potential short-term construction impacts at each site where noise sensitive receivers were identified.

Built into the model are estimates of equipment usage factors that reflect industry data for different pieces of equipment. For example, a concrete saw is typically 'in use' approximately 20-percent of the time when it is involved in a construction phase such as demolition (FHWA 2006). Appendix B summarizes the methods and assumptions used for this analysis. In estimating noise exposures from construction equipment, it was assumed that attenuation would occur as a result of geometric spreading and ground surface absorption. The geometric spreading of sound from a localized source (i.e., a point source) is discussed above. Existing or future noise abatement, such as sound walls, was not included in noise level estimates; and, therefore, the estimates are conservative.

Chapter 4 details estimated construction noise levels at each proposed site. Estimated construction noise levels would range between 68 dBA at proposed Site LEPS, which would be located 300 feet from a multi-family residential dwelling, and 89 dBA at proposed Site ENC1, which would be located 25 feet from scattered residential dwellings. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site; however, in some instances, it may be necessary for construction activities to take place outside these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

Hourly average worst case construction noise levels would be approximately 89 dBA at proposed Project sites where receivers are located within 25 feet and would be similar at other sites at this distance. None of the affected jurisdictions have established a construction noise level threshold. Therefore, construction noise levels at the proposed Project sites would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operational Impacts

During operation at each proposed Project site, the dominant noise source would be from the HVAC system, since this equipment would operate 24 hours a day. In addition, emergency generators would operate monthly and could impact sensitive receivers in close proximity. Both of these impacts are described in further detail below. The methods and assumptions underlying the analysis are summarized below and presented in more detail in Appendix B.

Each proposed Project site would require installation of an HVAC system which would also be enclosed in a shelter. According to the Air Conditioning, Heating, and Refrigeration Institute (AHRI) standard 270, the typical noise ratings for refrigeration units with 1.5-ton capacity range between 63 dBA and 67 dBA (AHRI 1997). To provide a conservative analysis, this analysis assumed that the noise emissions from the shelters would be 67 dBA and that the air conditioning units would be on the ground approximately 10 feet from a reflective surface. Based on the calculation methodology detailed in AHRI standard 275, which can be used to estimate the propagation of A-weighted noise from outdoor HVAC equipment based on the unit's proximity to reflective surfaces, position on or above the ground, and the pathway to noise sensitive (receiver) locations (AHRI 2011), the noise exposure from the HVAC systems would be 52 dBA at 10 feet. This analysis assumed the air conditioners would operate 24 hours a day; and, therefore, data were calculated as community noise equivalent level (CNEL). The basic conversion from L_{eq} to CNEL assumes a 5-dBA penalty and 10-dBA penalty added during evening hours (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.), respectively. Based on this calculation, the CNEL at 10 feet and 20 feet would be 59 dBA and 53 dBA, respectively. Noise from HVAC systems would not violate any thresholds established in local ordinances. In addition, noise levels would be below a 60-dBA CNEL threshold and would be considered "normally acceptable" for outdoor residential exposure established by the California Department of Health Services (see Section 3.10.2.2).

Emergency diesel generators (35 kW to 100 kW) would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators at the proposed sites would be housed by solid walls,

which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet, which is below the 60-dBA CNEL “normally acceptable” threshold for outdoor residential exposure.

Impacts from operation of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impacts

Groundborne vibration and groundborne noise levels are generally caused by impact devices such as pile driving; use of these devices is not anticipated during construction; however, operation of heavy equipment may generate localized groundborne vibration and noise that could be perceptible to sensitive receivers within close proximity.

Annoyance Assessment

Groundborne vibration noise levels were calculated and compared to FTA general assessment guidelines shown in Table 3.10-6. As described in further detail in Section 2.1.2.6, construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck similar to a loaded truck, and a jackhammer. As shown in the table, vibration levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet.

Table 3.10-6: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 feet	Approximate Lv* at 25 feet
pile driver (impact)	Upper range	1.518	112
	Typical	0.644	104
pile driver (sonic)	Upper range	0.734	105
	Typical	0.170	93
clam shovel drop (slurry wall)		0.202	94
hydromill (slurry wall)	In soil	0.008	66
	In rock	0.017	75
vibratory roller		0.210	94
hoe ram		0.089	87
large bulldozer		0.089	87
caisson drilling		0.089	87
loaded trucks		0.076	86

Table 3.10-6: Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 feet	Approximate Lv* at 25 feet
jackhammer	0.035	79
small bulldozer	0.003	58

*RMS velocity in decibels (VdB) re 1 micro-inch/second: PPV – peak particle velocity
Source: FTA, 2006

A majority of the sensitive receivers located within close proximity (25 feet) of the proposed Project sites, which include ENC1, PDC, SDW, SGH, WAD, WS1, and ZHQ, consists of residential development. According to FTA guidance, annoyance from groundborne vibration at residential land uses where people normally sleep is 80 VdB¹⁰ for infrequent events, defined as less than 30 daily events. The potential for annoyance exists from a single round trip by a 30-ton flatbed truck delivering large pieces of equipment such as the crane and reach fork, eight daily round trips by a dump truck hauling waste material from the site, and a single round trip by the concrete truck trip. As shown in the table, these trips have the potential for producing up to 86 VdB, exceeding the FTA annoyance threshold. Annoyance is an indicator of the potential for the proposed Project to result in exposure of persons to or generation of excessive groundborne noise levels; therefore, impacts from construction of the Project could expose sensitive receiver locations to excessive groundborne vibration. Impacts of the proposed Project at these receiver locations would be significant absent mitigation.

Damage Assessment

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels listed in Table 3.10-6 for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is not anticipated at sensitive receiver locations.

As detailed in Table 3.10-2, the ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. The ordinance prohibits construction activities in excess of this threshold. Table 3.10-6 indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV at 25 feet for a jackhammer to 0.089 PPV for a loaded truck such as the 3-ton flatbed. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites

¹⁰ The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per section and referenced as VdB.

would diminish below the 0.01 PPV vibration threshold for unincorporated Los Angeles County is 97 feet.

Similar estimated construction vibration levels are anticipated at other sites; however, other jurisdictions have not established a vibration level threshold. Therefore, construction vibration levels at the proposed Project sites in unincorporated Los Angeles County would not be higher than other sites but would exceed the established vibration level threshold. For purposes of this analysis, the EIR considers the unincorporated Los Angeles County's vibration level thresholds applicable and, thus, considers impacts in unincorporated Los Angeles to be significant.

Sensitive receivers (scattered residential dwellings) are located within this distance to proposed Project sites ENC1 and LACF072. At Site ENC1, which would be located within 25 feet of the closest residential dwellings, vibration from loaded trucks such as the 3-ton flatbed or dump trucks could be as high as 0.018 PPV depending on the geology, soil type and stiffness¹¹. At Site LACF072, which would be located within 65 feet of the closest residential dwelling, loaded trucks could produce as much as 0.076 PPV; therefore, impacts from construction of the Project could expose these sensitive receiver locations to excessive groundborne vibration; and impacts of the proposed Project would be significant.

Mitigation Measures

At sites ENC1 and LACF072, where construction vibration levels would exceed the unincorporated Los Angeles County vibration ordinance threshold, NOI MM 1 would be required.

NOI MM 1 Prior to commencement of construction at sites ENC1 and LACF072, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts to less than significant levels. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.
- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

Significance after Mitigation

Impacts would be less than significant with mitigation incorporated.

¹¹ Factors that can affect the efficiency of vibration propagation include geologic features, soil type and soil stiffness. Stiff clayey soils have been associated with efficient transfer of vibration energy. Shallow bedrock below 30 feet has also shown to exhibit high vibration efficiency.

Operational Impacts

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration-reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, operational groundborne vibration or noise would be less than significant during operation of each Project site.

Mitigation Measures

No mitigation measures are required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impacts

Although construction activities associated with the proposed Project sites would generate increases in noise levels, these increases would be temporary and of short duration. As discussed above, the FTA guidelines for a general noise assessment indicate 90 dBA during daytime hours (7 a.m. to 10 p.m.) and 80 dBA during nighttime hours (10 p.m. to 7 a.m.) are thresholds where adverse community reaction could occur for construction activities on a temporary basis (FHA 2006). As discussed under Impact NOI-1, the highest noise levels estimated at receivers located within 25 feet of proposed sites would be 89 dBA during the demolition phase of construction. Therefore, noise levels estimated at the proposed sites would not exceed the 90-dBA FTA adverse community reaction guidelines for a temporary increase in construction noise during daytime hours, but would exceed the 80-dBA threshold during nighttime hours. Nighttime operations would constitute a significant impact absent mitigation.

Additionally, for site WS1 in the City of Santa Monica, the City of Santa Monica ordinance sets a maximum 20-dBA temporary increase above acceptable exterior ambient noise levels, which are defined during weekdays as 60 dBA for a 15-minute duration during daytime hours (7 a.m. to 10 p.m.) and 50 dBA for a 15-minute duration during nighttime hours (10 p.m. to 7 a.m.) for construction activities. The ordinance also prohibits construction before 8 a.m. and after 6 p.m. on weekdays, before 9 a.m. and after 5 p.m. on weekends and designated U.S. holidays as shown in Table 3.10-2.

As discussed under Impact NOI-1, the highest noise levels estimated at receivers located within 25 feet of proposed sites would be 89 dBA during the demolition phase of construction. Within the City of Santa Monica, the closest ground-level receiver, a church, is located within 55 feet of the proposed Project Site WS1. A hotel is located within 25 feet of the proposed site; but the nearest sensitive receiver at the hotel is a rooftop pool, which is further away than the church. Temporary, short-duration daytime noise exposure at the church during the demolition construction phase would be 82 dBA, which would be

more than 20 dBA above the allowable short-duration daytime level of 60 dBA. Noise exposure at the church would be more than 20 dBA above the nighttime ambient noise level of 50 dBA established by the City, although weekday construction after 6 p.m. and before 8 a.m. is not permitted. Temporary or periodic increases above ambient noise levels due to construction noise at the proposed Project site in the City of Santa Monica (WS1) would not be greater than at other sites, but would exceed the established noise level threshold. For the purposes of this analysis, the EIR considers noise impacts in the City of Santa Monica significant absent mitigation.

Mitigation Measures

Measure NOI MM 2 would be required at sites ENC1, LACF072, PDC, SDW, SGH, WAD, and ZHQ if nighttime operations were to occur, and at Site WS1 at all times.

NOI MM 2 Prior to commencement of construction, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the FTA nighttime threshold or applicable ordinance. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

Significance after Mitigation

Implementation of NOI MM 2 would reduce noise impacts at all sites below threshold levels and impacts would be reduced to less than significant.

Operational Impacts

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the analysis makes reference to the FTA guidelines for temporary increases above ambient noise levels.

During operation of the proposed Project sites, emergency diesel generators with a 35-kilowatt (kW) to 100-kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet (APS 2015)¹².

¹² A 'residential quiet' well designed enclosure with air-scoops and foam is rated 64 to 68 dBA – quiet but noticeable at 10-feet / normal conversation at 21-feet. For the average residential application dBA levels in the 64 to 68 range are acceptable to most neighbors and meet most noise level restrictions if any exist.

Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet. All receivers identified for the Project are located beyond 21 feet. There are six Project sites (ENC1, SDW, SGH, SWP, WAD, and ZHQ) where the nearest receivers are located within 25 feet (depending on final layout of the sites) and would be exposed to approximately 56 dBA based on noise reduction through geometric spreading over distance. These six sites would be located in less developed areas with existing low ambient noise levels ranging from 45 dBA to 55 dBA. Adding the operational noise to ambient conditions would not result in noise level increases of 12 dBA over ambient conditions.

Impacts from operation of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impacts

One site (SDW) is located within a proposed ALUP for Brackett Field. Ambient conditions near this site are dominated by aircraft noise and are within the 65-dBA CNEL noise contour identified by the ALUP. Site SDW would be located approximately 25 feet from the nearest noise-sensitive receiver. Construction noise at this site would occur during operation of the concrete saw and is estimated to be 89 dBA at this distance. The combined baseline 65 dBA CNEL and the temporary, short-duration construction noise levels at receiver near Site SDW would remain at 89 dBA, which is below the 90-dBA threshold where adverse community reaction could occur but would exceed the 80-dBA nighttime threshold¹³.

Other Project sites within 2.0 miles of a public airport area of influence are outside the 65-CNEL noise contours. Estimated construction noise levels for all other proposed Project sites would be below the 90-dBA FTA threshold where adverse community reaction could occur during daytime hours but would exceed the 80-dBA nighttime threshold. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, none of the proposed Project locations are located in a jurisdiction with a noise ordinance that is applicable to the Authority.

Chapter 4 details estimated construction noise levels at each proposed site. The additional noise associated with temporary construction of a Project site, combined with aircraft-related noise, would not be expected to expose people residing or working in the Project area to excessive noise levels.

Impacts from construction of the Project would be less than significant.

¹³ Under the rules of decibel addition, two noise sources separate by 10 decibels or greater sum to the higher of the two levels as detailed in the FHWA guidance document Highway Traffic Noise: Analysis and Abatement (FHWA 2011).

Mitigation Measures

No mitigation measures are required.

Operational Impacts

After construction, all sites will be unmanned during operation except for occasional maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Noise from maintenance activities, which includes an estimated 58 dBA at 21 feet during the monthly backup generator during testing, would not be substantially different from existing levels except for new sites in rural locations, where ambient noise levels would be closer to 45 dBA, and would generally occur less than once per week during daytime hours between 8:00 a.m. and 6:00 p.m. on any day and 9:00 a.m. to 6:00 p.m. on Sundays, consistent with the Los Angeles County noise ordinance. Operation of the Project, including the HVAC system and emergency generator, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the Project would not expose people residing or working in the project area to excessive noise levels.

Impacts from operation of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Seven proposed Project sites are within the vicinity (up to 2.0 miles) of private airstrips, with one site near a seaplane base, and the others near heliports (see Table 3.10-4). One proposed site (PASPD01) is located within 0.25 to 0.5 mile from the private airstrips and within urban areas. This site is located well outside the airstrips, where most noise is generated. A noise impact contour based on local CNEL guidelines, if they exist, would be located closer to private airstrips due to lower volume traffic (takeoffs and landings) compared to larger, busier airports.

Construction Impacts

Conservatively assuming a 65 dBA CNEL at the proposed Project site located 0.25 mile from private airstrips, this combined baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-dBA threshold where adverse community reaction could occur. Chapter 4 details estimated construction noise levels at each proposed Project site. Therefore, construction of these sites would not expose people, workers, or residents to excessive noise levels. Impacts from construction of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operational Impacts

After construction, all seven sites within the vicinity (up to 2.0 miles) of private airstrips will be unmanned during operation except for occasional maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Conservatively assuming a 65 dBA CNEL at proposed Project sites located 0.25 mile from private airstrips, operation of the Project, including the HVAC systems and emergency generators, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the Project would not expose people residing or working in the Project area to excessive noise levels.

Impacts from operation of the Project would be less than significant.

Mitigation Measures

No mitigation measures are required.

3.10.4.2 No Project Alternative

Under the No Project Alternative, none of the Project sites would be constructed. Therefore, no noise exposure or impacts would occur from construction equipment, worker commuting vehicles, or material transport trucks. Existing communication sites would continue to operate and be inspected, maintained, and repaired; noise levels associated with operations and maintenance would not change.

3.10.5 Cumulative Impacts

3.10.5.1 Geographic Extent

As discussed in Section 3.10.4, Impact Analysis, construction-related noise from the demolition phase would diminish from a maximum of 89 dBA at receivers located closest (25 feet) to a proposed Project site to ambient (55 dBA) levels within about 725 feet over a soft ground surface and within about 1,425 feet over a hard ground surface. Operational noise from the proposed Project would dissipate to ambient levels within less than 20 feet of the proposed site boundaries. Vibration from construction and operation of the proposed Project sites would dissipate to acceptable levels (80 VdB or 0.12 PPV) within 100 feet. To assess the potential cumulative noise and vibration impacts with past, present, and reasonably foreseeable future projects, projects within 1,500 feet of the perimeter of Project site boundaries were considered.

Based on a review of Table 2.7-1, sites ENT, LEPS, MML, MTL2, PASPD01, PDC, PHN, PWT, RIH, SGH, SIM, SUN, SUN2, WS1, and ZHQ would be constructed within 1,500 feet of other projects. The remaining proposed Project sites have no other projects within 1,500 feet; therefore, there would be no potential for cumulative effects at those proposed locations.

3.10.5.2 Existing Cumulative Conditions

Ambient Levels. Cumulative noise and vibration levels within the counties of Los Angeles and San Bernardino and throughout the incorporated cities include and will continue to include an expanded number of sources of man-made noise and vibration, mainly due to increased roadway traffic, air traffic,

and other human activity including construction projects and an expanded geographic area of impact as urbanization spreads and population grows. Past, present, and reasonably foreseeable future projects listed in Table 2.7-1 would add to the future expected noise levels throughout the study area; however, varying noise and vibration levels would continue to occur depending on the proximity to human activity. Rural communities or unpopulated lands will continue to have the lowest noise and vibration levels.

Sensitive Receivers. Cumulative conditions will introduce new residences or other sensitive receivers to areas near the proposed Project. Past, present, and reasonably foreseeable future projects listed in Table 2.7-1 would bring an increased number of noise sensitive uses to the area. The significance criteria identified in Section 3.10.4 are used to characterize the cumulative impacts.

Construction vs. Operational Impact Assessment. The analysis of the cumulative impact of proposed Project sites on other past, present, and reasonably foreseeable future projects addresses the cumulative effect of construction noise and vibration and operational noise and vibration separately, as each type of noise and its potential impact on sensitive receivers is regulated and evaluated differently in the Project impact assessment.

3.10.5.3 Cumulative Impact Analysis

Construction of other projects listed in Table 2.7-1 would involve construction activities that could occur concurrently with one or more of the proposed Project sites. Because of variability in project timelines, many of the projects would not likely contribute to overlapping impacts in the cumulative scenario; however, it is possible that a variety of projects could occur at the same time as construction of the proposed Project sites. For instance, the construction of the 7,633 single-family unit residential subdivision on Old Topanga Canyon Road within 1,500 feet of Site ENT would increase the likelihood of concurrent construction activities. Other large projects, including the renovation of the 48,000 square-foot Julia Morgan Building and addition of a new hotel within 1,500 feet of Site PASPD01 and the development of a 391-acre mixed-use site at University City Plaza within 1,500 feet of Site SIM, would also have an increased likelihood of concurrent construction. Still other projects, such as the new signage and storefront color change project at 64 E. Colorado Boulevard in Pasadena near Site PASPD01, would not involve similar construction activities; and project overlap would not be an issue. Construction from past projects such as the LTE sites listed in Table 2.7-1, however, would not occur simultaneously with the proposed Project sites and have not been evaluated further.

Conversely, operation of the proposed Project sites would overlap with all past, present, and reasonably foreseeable future projects.

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

There are no federal or state standards for short-term noise exposure, and none of the affected jurisdictions have established a construction noise level threshold. Therefore, construction noise levels at the proposed Project sites would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant. In the areas where Project construction may occur simultaneously with other present and reasonably foreseeable development, the combined effects of noise generated by the Project and other development could adversely impact noise-sensitive receivers cumulatively. Projects listed in Table 2.7-1 involving the construction of new housing units would introduce new noise-sensitive receivers within 1,500 feet of proposed Project sites ENT, LEPS, SIM, and WS1. The combined effect of construction noise from a proposed Project site and from other projects listed in Table 27-1 could increase noise levels experienced by sensitive receivers depending on the difference between the individual construction noise levels from each project. The FHWA guidance document *Highway Traffic Noise: Analysis and Abatement* (FHWA 2011) explains the rules of decibel addition used to determine a combined noise level from multiple sources.

A difference of 0 to 1 dBA between construction noise sources would increase noise levels perceived by sensitive receivers by 3 dBA and a difference of 4 to 9 dBA between construction noise sources would increase noise levels perceived by sensitive receivers by 1 dBA. A greater than 10-dBA difference between construction noise sources would be equivalent to sensitive noise receivers perceiving construction noise from the louder source only. However, because none of the affected jurisdictions have established a construction noise level threshold, noise levels at the proposed Project sites in combination with noise from other projects simultaneously under construction would not generate noise in excess of standards established in a local general plan or noise ordinance. There would be no significant cumulative impacts from the Project.

The analysis of operational noise from the proposed Project sites determined that the only continuous source of operational noise, HVAC systems for equipment shelters, would remain below the FTA 60 dBA CNEL considered “normally acceptable” for outdoor residential exposure. Although the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity, the HVAC noise would also not exceed any of the non-construction thresholds established by affected jurisdictions, including unincorporated Los Angeles County and the City of Santa Monica. As shown in the impact assessment (Section 3.10.4.1, NOI-1), noise from HVAC operation for the proposed sites would be 52 dBA at 10 feet, or 44 dBA at the minimum site boundary distance of 25 feet, which is equivalent to ambient levels in sparsely developed areas and below non-construction limits established by these jurisdictions.

Operational noise from past, present, and reasonably foreseeable future projects would be limited under thresholds established by local ordinances. The other projects located within 1,500 feet of the proposed Project sites would likely include similar sources of operational noise, namely HVAC systems for residential units that would dissipate at the property line to ambient levels and would comply with local noise ordinance thresholds and “normally acceptable” exposure levels for sensitive receivers. It is

possible that some of the projects listed in Table 2.7-1 could include sources of operational noise distinct and possibly higher than operational noise associated with the proposed Project sites.

The Tehachapi Renewable Transmission project would be located within 1,500 feet of proposed Project Site RIH and would need to comply with 60-dBA weekday daytime and 50-dBA weekday nighttime thresholds established by unincorporated Los Angeles County; therefore, it can be assumed that the maximum difference between this operational source of noise and Site RIH operational noise (44 dBA) would be 16 dBA during daytime hours and 6 dBA during nighttime hours. The cumulative effect of noise from Site RIH and this project could expose sensitive receivers to a cumulative increase that is 1 dBA in excess of (nighttime) standards established in a local general plan or noise ordinance. However, the contribution of the Project site operational noise, which is equivalent to ambient conditions, would not be significant, and the other project would need to apply for a variance for nighttime construction; therefore, no significant cumulative impact would occur.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Sensitive receivers within 25 feet of sites PDC, SDW, SGH, WAD, WS1, and ZHQ, would be exposed to noise from groundborne vibration exceeding the FTA annoyance threshold; therefore, impacts from construction of the Project could expose sensitive receiver locations to excessive groundborne noise levels. NOI MM 1 would be required to reduce Project impacts during construction to less than significant levels. Construction of other projects listed in Table 2.7-1, especially the larger housing and development projects, could occur concurrently causing a cumulative increase in groundborne noise in excess of the FTA threshold and a significant cumulative impact; however, the contribution of the proposed Project with these sites would not be cumulatively considerable. Groundborne noise from construction of past projects such as the LTE sites listed in Table 2.7-1 would not occur simultaneously with the proposed Project sites and have not been evaluated further.

An analysis based on FTA vibration damage criteria determined that no impacts would occur at sensitive receiver locations as close as 25 feet from the construction of these proposed Project site boundaries. Other projects would not be constructed as close to the same susceptible structures and the residential/commercial development projects listed in Table 2.7-1. For example, the new mixed-use office/retail/residential project near proposed Site WS1 would add newer buildings (receivers) with higher vibration damage thresholds in the vicinity of proposed Project sites. Although a cumulative effect on groundborne vibration could result, the contribution of Project site construction would not be significant; therefore, no significant cumulative impact would occur.

Two proposed Project sites, ENC1 and LACF072, would be located within the jurisdiction of unincorporated Los Angeles County, which has established a perceivable motion threshold for construction vibration. NOI MM 1 would be required to reduce Project impacts during construction to less than significant levels; however, none of the projects listed in Table 2.7-1 are located within 1,500

feet of these two sites. No cumulatively considerable effects from construction vibration would occur at these sites.

The proposed Project sites would install newly manufactured portable generators equipped with rubber mounts or other vibration-reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Therefore, groundborne vibration or noise would be less than significant during operation. Other projects listed in Table 2.7-1, such as the listed commercial/residential development projects, would either not have an operational source of groundborne vibration or noise or would likely use generators and other motorized equipment fitted with similar dampening modifications. No cumulative impacts from operational sources of groundborne vibration or noise would occur at these sites.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Noise levels estimated at proposed Sites ENC1, PDC, SDW, SGH, WAD, and ZHQ would exceed the 80-dBA FTA adverse community reaction guidelines for a temporary increase in construction noise during nighttime hours. This is a significant impact absent mitigation; however, NOI MM 2 would reduce Project impacts during construction to less than significant levels. Temporary or periodic increases in ambient noise levels from the concurrent construction of other projects listed in Table 2.7-1, such as the small residential improvement projects on Ocean View Drive and Avis Court near Site SGH, are unlikely to be cumulatively significant. Conversely, other projects such as the Mirador Apartment Complex near Site PASPD01 or construction/demolition of the ATF equestrian facilities, could produce similar vibration levels but sensitive receivers near the Project site closest to these other projects, PWT, are at much greater distances to Site PWT and would not to exceed the FTA threshold. In combination, a cumulative increase in temporary noise levels could occur; however, there would be no significant cumulative impact and the contribution of the proposed Project would not be cumulatively considerable.

Within the City of Santa Monica, temporary increases in noise from the construction of Site WS1 would be substantial and, therefore, significant. After implementation of NOI MM 2, impacts of the proposed Project would be less than significant. Temporary or periodic increases in ambient noise levels from the construction of other projects within 1,500 feet of WS1, which includes the Miramar Hotel mixed-use project located 177 feet away, would need to comply with the City ordinance limiting a temporary or periodic increase above ambient levels at the property boundary. In combination, a cumulative increase in temporary noise levels at sensitive receivers would not occur with the implementation of construction noise mitigation measures at WS1. The contribution of the proposed Project Site WS1 would not be cumulatively considerable.

The temporary and periodic contribution to ambient noise levels from monthly backup generator testing would not result in noise level increases above the 12-dBA Caltrans threshold applied to the assessment of Project sites. Impacts from operation of the Project would be less than significant. None of the affected jurisdictions have established thresholds for increases above ambient levels from facility

operation, and there are no federal or state standards for short-term noise exposure. Lacking a threshold or ordinance, it is possible that other projects listed in Table 2.7-1 could be potential sources of temporary or periodic increases in noise levels above ambient levels; however, the types of projects located within 1,500 feet of proposed Project sites are primarily residential and commercial retail developments. Projects such as the 20-story commercial structure on Melrose Avenue that would be located within 823 feet of Site PDC would not be expected to be sources of temporary or periodic noise that could substantially increase noise levels above the ambient level. Industrial projects including the Sunshine Canyon Landfill 69-kV subtransmission line segment relocation, which would be immediately adjacent to Project Site OAT, may incorporate HVAC and generator equipment; but the Project analysis indicates these are not a potential source of significant temporary or periodic noise that would significantly affect ambient noise levels; therefore, no significant cumulative impact from proposed Project site operational noise sources and other project operational noise sources would occur.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Only one proposed Project site, WS1, would be located within 2 miles of a public airport, Santa Monica Municipal, and would also have other past, present, and foreseeable future projects located within 1,500 feet. This site would be located outside the 70-dBA CNEL contour established by the Los Angeles County ALUP; therefore, construction workers would not be exposed to excessive noise levels from the airport. People residing near the site would also not be exposed to noise levels that would exceed any local general plan or noise ordinance or applicable standards of other agencies as a result of Project construction. Similarly, operation of the proposed Project would not expose maintenance personnel to excessive noise from the airport or residents to excessive operational noise levels. Other planned, present, and foreseeable future projects would also be located outside the airport's 70-dBA CNEL contour and would not create a cumulative exposure for workers or residents near Site WS1 to excessive noise levels; therefore, no significant cumulative impacts would occur.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Only one proposed Project site, PASPD01, would be located within 2 miles of private airstrips, Huntington Memorial Hospital Heliport/Mesa Heliport/Super Bowl Heliport, and would also have other past, present, and foreseeable future projects located within 1,500 feet. Noise generated by helicopter use of heliports is primarily concentrated at the takeoff/landing pad, especially for an elevated pad such as the Huntington Memorial Hospital Heliport. Therefore, construction workers would not be exposed to excessive noise levels from the heliports. People residing near the site would also not be exposed to noise levels that would exceed any local general plan or noise ordinance or applicable standards of other agencies as a result of Project construction. Similarly, operation of the proposed Project would not expose maintenance personnel to excessive noise from the heliports or residents to excessive operational noise levels. Other planned, present, and foreseeable future projects would also be located



outside the heliport noise contour and would not create a cumulative exposure for workers or residents near PASPD01 to excessive noise levels; therefore, no significant cumulative impacts would occur.

3.11 Recreation

This section identifies the proposed Project sites that coincide with lands that may be designated or managed for recreation purposes and the potential impacts the Project sites would have on the recreation uses associated with facilities designated for recreational use.

3.11.1 Environmental Setting

Proposed Project sites are located in varying settings, some of which are adjacent to recreational areas. Potentially affected recreation areas include:

- Wilderness or other recreational features within the Angeles National Forest and San Gabriel Mountains National Monument
- Recreational trails and trailhead facilities such as parking areas or kiosks
- Designated recreational facilities on federal, state, county, or city land within the vicinity of the proposed Project sites, including public parks, lakes and streams, boating areas, campgrounds, playgrounds, shooting ranges, etc.
- Open space preserves, which are often used for recreational purposes

Table 3.11-1 identifies the proposed Project sites located on lands or facilities that may be used or managed for recreation. Not all of these recreation and open space areas are necessarily used for recreation in the vicinity of a given proposed Project site. The site list in Table 3.11-1 accounts for potential direct physical impacts to lands identified as a park, recreation area, open space, or recreational trail regardless of immediate use within the identified recreational or open space lands. Sites not on recreational land or on an established public trail are not listed.

Table 3.11-1: Proposed Project Sites on Land Designated for Potential Recreational Use

Site ID	Site Name	Recreation Area	Type of Recreational Use/Facility in the Recreation Area and Current Use
BJM	Black Jack Peak	Santa Catalina Island Open Space Easement	Open space available for recreational use, including being approximately 0.25 mile from Blackjack Campground. The proposed site itself, however, is already developed as a communications site.
DPK	Dakin Peak	Santa Catalina Island Open Space Easement	Open space available for recreational use, including being approximately 0.25 mile from Blackjack Campground. The proposed site itself, however, is already developed as a communications site.
GRM	Green Mountain	Topanga State Park within Santa Monica Mountain National Recreation Area	Opportunities vary by location but may include camping, rock climbing, biking, horseback riding, swimming, etc. Topanga State Park includes

Table 3.11-1: Proposed Project Sites on Land Designated for Potential Recreational Use

Site ID	Site Name	Recreation Area	Type of Recreational Use/Facility in the Recreation Area and Current Use
			numerous hiking trails. The proposed site itself, however, is already developed as a communications site.
H-17A	H-17A	Hellman Park	Opportunities include hiking and horseback riding
LACFCP08	Camp 8	National Park Service land within Santa Monica Mountain National Recreation Area	Opportunities vary by location but may include camping, rock climbing, biking, horseback riding, swimming, etc. The proposed site itself, however, is partially developed and is adjacent to a highly developed property.
LACFCP11	County CP 11	Angeles National Forest, Santa Clara River Trail	Multi-use land that may include recreational use, including being within 0.25 mile of Santa Clara River Trail. The proposed site itself, however, is partially developed and is adjacent to a highly developed property.
PHN	Puente Hills	Schabarum Extension Trail	Developed trail, including existing communications site, trail coincides with portions of the access road
PWT	Portshead Tank	National Park Service land within Santa Monica Mountain National Recreation Area	Opportunities vary by location but may include camping, rock climbing, biking, horseback riding, swimming, etc. The site itself, however, includes a storage tank, and most of the site has been previously disturbed.
RIH	Rio Hondo	Schabarum-Skyline Trail	Developed trail, including existing communications site; trail coincides with portions of the access road
TWR	Tower Peak	Santa Catalina Island Open Space Easement	Open space. The proposed site itself, however, is already developed as a communications site.
VPK	VPK	Henderson Canyon Open Space	Hiking, dog walking, horseback riding, cycling. The proposed site itself, however, is already developed as a communications site.
WAD	Walker Drive	Los Angeles City Water Resources Parkland	Open space and parkland Including Beverly Hills City Parkland within 0.1 mile of the site. The proposed site itself, however, is developed, including a storage tank and monopole.
ZHQ	Zuma Life Guard HQ	Zuma Beach County Park	Swimming, surfing, fishing, beach-going; horseback riding available within 0.25 mile at Malibu Equestrian Park. The site itself, however, is completely developed with buildings and a parking area.

3.11.2 Regulatory Setting

Numerous laws and regulations exist to protect the ability of the public to enjoy natural and developed lands for recreational pursuits. For example, the Clean Air Act and Clean Water Act support protection of air quality and water resources, respectively, which contribute to the outdoor recreation users' experience. A few key regulations provide a certain emphasis on the designation, preservation, and/or protection of land for the purpose of recreation and are highlighted in this section. While these laws and regulations do not have permit requirements, they provide an understanding of the importance of preserving open space for recreational purposes as well as the protection of sensitive natural resources.

3.11.2.1 Federal Regulatory Setting

U.S. Forest Service

Multiple Use, Sustained Yield Act of 1960

The Multiple Use Sustained Yield Act authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range, water, recreation, and wildlife on the national forests for multiple use and sustained yield of the products and services. The goals are to manage these resources in the combination that best meets the needs of the American people while maintaining the productivity of the renewable resources in perpetuity.

Department of the Interior and Department of Agriculture

Wilderness Act of 1964

The National Wilderness Preservation System was established to ensure that expanding settlement and growing mechanization would not result in a lack of lands designated for preservation and protection in their natural condition. In the Wilderness Act (P.L. 88-577; 16 U.S.C. 1131-1136), wilderness is defined as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." Other characteristics defining a wilderness include:

- An area retaining its primeval character and influence without permanent improvements
- Generally appears to be affected primarily by the forces of nature
- Provides outstanding opportunities for solitude or a primitive and unconfined type of recreation
- May contain ecological, geological, or other features of scientific, educational, scenic, or historical values

3.11.2.2 State Regulatory Setting

Open Space Easement Act of 1974 (California Government Code Section 51070 et seq.)

Cities and counties may accept or purchase easements from private landowners for open space and resource conservation purposes. When the open space easement is acquired pursuant to the Open

Space Easement Act of 1974, the land must remain within an easement in perpetuity or for at least 10 years. A city or county must have an adopted open space plan element as a prerequisite to acquiring an open space easement, and preserving the easement land in open space must be consistent with the local jurisdiction's General Plan (Governor's Office of Planning and Research 1997).

3.11.2.3 Local Regulatory Setting

Los Angeles County

Los Angeles County adopted its 2035 General Plan in October 2015, and it is directly applicable to unincorporated lands not in federal or state jurisdiction within Los Angeles County.

General Plan Provisions for Parks, Recreation, and Open Space

Park and recreational planning in Los Angeles County is largely guided by the 1992 *Parks and Recreation Strategic Plan for 2010* and the 2004 *Strategic Asset Management Plan for 2020*, both prepared by the Department of Parks and Recreation. The County's park system totals nearly 70,000 acres and includes local parks, regional parks, and multi-user trails and access to other recreation facilities such as city parks. Trail use ranges from hiking and walking to mountain biking and horseback riding. The 2035 General Plan notes that the quality of the trail experience is directly proportional to the state of the visual, natural, and educational environment through which the trail passes, and thus adopted the County of Los Angeles Trails Manual to provide County staff with guidelines and standards for trail planning, design, and maintenance (Los Angeles County 2015b).

In addition to local and regional parks and trails, other types of recreation facilities include multi-benefit parks (such as flood control basins that can be used for recreation), school sites, city parks and facilities, private recreational facilities, and greenways.

The Conservation and Natural Resources Element of the 2035 General Plan addresses the importance of open space. Los Angeles County works with various land conservancies to maintain and protect open space land, some of which has been adopted into the County's Significant Ecological Areas (SEAs) Program.

California Quimby Act

The California Quimby Act, which is part of the Subdivision Map Act, applies to residential subdivisions. The act permits the County to require the dedication of land (generally 3 or more acres of parkland per 1,000 subdivision residents) or payment of fees for park and recreation purposes.

San Bernardino County

San Bernardino County Adopted its General Plan in 2007, with the last amendment approved in April 2014. The General Plan is directly applicable to unincorporated lands not within federal or state jurisdiction within San Bernardino County.

General Plan Provisions for Open Space

The Open Space Element of San Bernardino County’s General Plan guides the protection and preservation of open space, recreation, and scenic areas, while accommodating future growth within the county. Goals include providing open space, parks, trails, and recreational amenities; preserving cultural and scenic resources; enhancing the character of scenic routes; and minimizing conflicts between open space and surrounding land uses (San Bernardino County Land Use Services Division 2014).

Nearly 80 percent of San Bernardino County land is held in federal ownership and is administrated by several different federal agencies including the Bureau of Land Management, U.S. Forest Service, and National Park Service. The vicinity of the LMR site with San Bernardino County, however, is not under federal or state land management and is within the “cities” designation of the open space overlay map (San Bernardino County Land Use Services Division 2014).

Affected Cities

General Plans and zoning ordinances for incorporated cities in which a proposed Project site is located on or adjacent to recreation lands or a trail were reviewed for goals, policies, or ordinances that may be applicable to the establishment or operation of LMR facilities in the context of recreation and open space. Table 3.11-2 summarizes those policies and ordinances by community.

Table 3.11-2: Community Policies and Ordinances Applicable to Communication Sites

City/Town	Recreation and Open Space General Plan Policies and Ordinances Potentially Applicable to Communication Sites
Beverly Hills	<ul style="list-style-type: none"> Protect, enhance, and expand open space resources, remaining natural areas, and significant wildlife and vegetation in the City as integral parts of a sustainable environment within a larger regional ecosystem... Encourage new development on hillsides and in canyon areas to preserve natural land formations and native vegetation... (City of Beverly Hills General Plan, Open Space Element, Policy OS-1: Natural and Open Space Protection) Protect parkland from non-recreational uses that result in loss of acreage used for recreational purposes; any loss of park land shall be replaced with acreage suitable for comparable uses so that the City's current park land acreage is not decreased. (City of Beverly Hills General Plan, Open Space Element, Park and Recreational Facilities, Policy OS-8.7: Recreational Parkland Replacement)
Carson	<ul style="list-style-type: none"> Uses permitted in the Open Space Zone or eligible for consideration as a special use: minor and major communications facilities are subject to the requirements of Carson Municipal Code 9138.16. Minor uses are an automatically permitted use provided special limitations and requirements are satisfied as noted in the code and major uses are permitted upon approval of a Conditional Use permit. (City of Carson Municipal Code, Division 1, 9151.1 Uses Permitted; Transportation, Communications,

Table 3.11-2: Community Policies and Ordinances Applicable to Communication Sites

City/Town	Recreation and Open Space General Plan Policies and Ordinances Potentially Applicable to Communication Sites
	Utilities)
Cerritos	<ul style="list-style-type: none"> Ensure that no net loss of open space acreage occurs within the City. (City of Cerritos General Plan, Chapter 8 Open Space/Recreation Element, Maintain Open Space in the City, Policy OSR-5.1)
Glendale	<ul style="list-style-type: none"> All wireless telecommunications facilities and accessory wireless equipment shall comply with... the city's noise regulations as set forth in chapter 8.36 (City of Glendale Municipal Code, Title 30 Zoning Chapter 30.48 Wireless Telecommunications Facilities Permits, Section 30.48.070 Wireless telecommunications facilities development standards, Item A.1) The SR (Special Recreation) zone is intended as a zone for public and private open space and recreational uses and is intended to provide and protect open space, natural physical features, and scenic resources in accordance with the comprehensive general plan of the city. Individual review of all uses and development is provided due to the unique and special characteristics of the variety of recreational uses possible in order to foster compatibility between uses and to protect the public health, safety, and general welfare of the community (City of Glendale Municipal Code, Title 30 Zoning, Chapter 30.15 Special Purpose Districts, Section 30.15.010 Purpose, Item D.) Utility and transmission facilities may be permitted in the special purpose zoning districts (which includes the SR zone) subject to approval of a conditional use permit. (City of Glendale Municipal Code, Title 30 Zoning, Chapter 30.15 Special Purpose Districts, Section 30.15.020 Special purpose district land uses and permit requirements, Item B.) The [Noise] element suggests that the normally acceptable range for playgrounds and neighborhood parks be established at less than 70 decibels (City of Glendale General Plan, Open Space and Conservation Element, Chapter 4 – The Open Space and Conservation Plan, Item f. Noise, page 4-30).
Los Angeles	<ul style="list-style-type: none"> Roof-mounted antennas shall be located at the greatest feasible distance from the edge of the building. Equipment and antennas shall not extend more than 10 feet above the highest point of the rooftop, unless mounted on the walls of a penthouse (City of Los Angeles Planning and Zoning Municipal Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning Comprehensive Zoning Plan, Section 12.21 General Provisions, Item A. Use, 20 Wireless Telecommunication Facilities Standards [a][2][ii] Attached or Roof Mounted Antenna Setback). An effort shall be made to locate new [wireless telecommunications facilities] on existing approved structures or sites (City of Los Angeles Planning and Zoning Municipal Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning –

Table 3.11-2: Community Policies and Ordinances Applicable to Communication Sites

City/Town	Recreation and Open Space General Plan Policies and Ordinances Potentially Applicable to Communication Sites
	<p>Zoning Comprehensive Zoning Plan, Section 12.21 General Provisions, Item A. Use, 20 Wireless Telecommunication Facilities Standards [a][3] Locating Antenna at Existing Sites)</p> <ul style="list-style-type: none"> • ...The [wireless telecommunication facilities] shall be designed to have the least possible visual impact on the environment... (City of Los Angeles Planning and Zoning Municipal Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning Comprehensive Zoning Plan, Section 12.21 General Provisions, Item A. Use, 20 Wireless Telecommunication Facilities [a][4] Visual Impact) • Ground, roof, and pole mounted antennas shall be screened by fencing, buildings, or parapets that appear to be an integral part of the building or landscaping so that not more than 25 percent of the combined tower structure and antenna height is visible from grade level of adjoining property and adjoining public rights-of-way. (City of Los Angeles Planning and Zoning Municipal Code, Chapter I General Provisions and Zoning, Article 2 Specific Planning – Zoning Comprehensive Zoning Plan, Section 12.21 General Provisions, Item A. Use, 20 Wireless Telecommunication Facilities [a][5][i] Screening) • Where development is allowed in ecologically important areas, the intensity of development should be kept at a minimum consistent with reasonable uses of the land. All measures should be taken to protect these areas including buffering ecologically important areas from conflicting or detrimental uses. (City of Los Angeles General Plan, Open Space Element, Privately Owned Open Space Lands and Desirable Open Space, Policy 4, page 7)
Malibu	<ul style="list-style-type: none"> • The following uses may be permitted subject to obtaining a conditional use permit: A. Wireless telecommunications antennae and facilities (pursuant to Chapter 17.46) provided, that... it is not feasible to locate such... facility on any other non-residentially zoned property (other than recreational vehicle park zoning districts) B. Emergency communication and service facilities (City of Malibu Municipal Code, Title 17 Zoning, Chapter 17.32 OS Public Open Space District, Section 17.32.030 Conditionally permitted uses) • The City shall preserve, protect, and enhance the character and visual quality of natural open space as a scenic resource of great value and importance to the quality of life of residents and to the enhancement of the scenic experience of visitors. (City of Malibu General Plan, Section II Elements of the General Plan, Chapter 2.0 Open Space and Recreation Element, Section 2.5 Goals, Objectives, Policies and Implementation Measures, Item 2.5.1 OS Goal 1: An Abundance of Open Space Contributing to a Rural, Natural Environment Consistent with this Open Space Management Plan, Open Space [OS] Policy 1.1.3)
Rancho Palos Verdes	<ul style="list-style-type: none"> • The installation and/or operation of a commercial antenna shall require the submittal

Table 3.11-2: Community Policies and Ordinances Applicable to Communication Sites

City/Town	Recreation and Open Space General Plan Policies and Ordinances Potentially Applicable to Communication Sites
	<p>and approval of a conditional use permit [to] a. To minimize visual impacts of antenna towers through careful design, siting and vegetation screening; b. To avoid damage to adjacent properties from tower failure through careful design and siting of tower structures; c. To maximize use of an existing transmission or relay tower to minimize the need to construct new towers; d. To ensure that antennas are compatible with adjacent uses. (City of Rancho Palos Verdes Municipal Code, Title 17 – Zoning Chapter 17.76 Miscellaneous Permits and Standards, Section 17.76.020 Antennas, [A] Commercial Antennas, [1] Purpose)</p> <ul style="list-style-type: none"> • The applicant shall demonstrate that the tower can be expected to have the least visual impact on the environment, taking into consideration technical, engineering, economic, and other pertinent factors. Towers clustered on the same site shall be of similar height and design whenever possible. (City of Rancho Palos Verdes Municipal Code, Title 17 – Zoning, Chapter 17.76 Miscellaneous Permits and Standards, Section 17.76.020 Antennas, [A] Commercial Antennas, [5] Visual Impact) • The applicant shall provide a landscape plan to be approved by the director or planning commission. The plan shall note specifications for landscape and screening, including plantings, fences, walls, and other features designed to screen and buffer towers, accessory uses, and stored equipment. Native vegetation shall be preserved to the greatest extent practicable and incorporated into the landscape plan. (City of Rancho Palos Verdes Municipal Code, Title 17 – Zoning, Chapter 17.76 Miscellaneous Permits and Standards, Section 17.76.020 Antennas, [A] Commercial Antennas, [8] Landscaping)

3.11.3 Significance Criteria

The proposed Project would result in significant impact to recreation if the following significance criterion is met:

- 1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Based on the Initial Study (IS) for the LMR project, it was determined that the project would not include or require construction or expansion of recreation facilities, and no further analysis of that topic is warranted within the LMR EIR.

3.11.4 Impact Analysis

3.11.4.1 Proposed Project

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impacts

Construction of the proposed Project sites would not result in an increased use of parks or other recreational facilities. Of the proposed Project sites on land within a park, recreation area, open space, or trail, all are within previously developed areas, including areas that currently are highly developed or on an existing communication site. Consequently, building and operating a telecommunications site in the proposed location would not convert land that is currently in use for recreational purposes, change the recreational experience, or contribute to closure of the recreational facility or displacement of recreational visitors to other parks. Access to individual recreational facilities would not change as a result of development of proposed Project sites. The construction workforce would be obtained from the local population, so no increase in the general population would put additional demand on the existing recreational facilities. No impacts would occur from construction of the Project.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

All proposed Project sites within a recreation area (as listed in Table 3.11-1) are on previously developed land, and several sites require adding equipment or expanding existing communications facilities. All proposed Project sites within parks, recreation areas, or open space have been previously developed and have existing access. Because access to the proposed Project sites exists and would not change as a result of the Project, actions to further develop the existing sites would not change access to parks, open space, trails, or other recreational facilities in proximity to the proposed Project sites.

No impacts would occur from operation of the Project, as the sites are not expected to change recreational opportunities or the recreational experience compared to existing conditions.

Mitigation Measures

No mitigation measures are required.

3.11.4.2 No Project Alternative

Like the proposed Project, the No Project Alternative would cause no change in the current usage or conditions affecting parks or recreational facilities. No impacts would occur.

3.11.5 Cumulative Impacts

Construction of a communications facility can typically be completed in about six weeks and can be accomplished by local workers. Facilities are unmanned, so operations and maintenance require few employees to maintain large numbers of sites. Consequently, even if more sites were proposed than those addressed by this analysis, the Project would have no effect in the use of local or regional recreational facilities by the work force and their families.

The only other potential impact on recreation is the placement of communications sites on land set aside for recreational purposes. As identified in this analysis, all of the proposed Project sites addressed in this analysis within recreational facilities coincide with previously developed property. Therefore, no change in the amount of land available for recreation use would occur.

Because the proposed Project would have no effect on recreation, there would be no contribution to cumulative effects to recreation.

3.12 Transportation/Traffic

This chapter analyzes the impacts of Project development on the existing and future transportation and circulation system in the vicinity of the Project site. Transportation issues of concern that are addressed include the effects of the proposed Project sites on highways or roadways identified in the Congestion Management Program (CMP) and the installation of towers that might interfere with existing flight path approaches to airports and heliports.

3.12.1 Environmental Setting

3.12.1.1 Highways and Roadways

Los Angeles County has an extensive network of interstate freeways, state highways, regional roadways and local surface streets that provide access throughout the study area. The highway system extends to adjoining counties, including San Bernardino County where one proposed Project site is located. This highway and roadway network is the major means of transportation throughout Los Angeles County and the surrounding region. Interstate highways serve as regional evacuation routes during emergencies. The highway network spans the county in all directions and links critical infrastructure facilities such as the ports of Los Angeles and Long Beach and major airports such as Los Angeles International Airport and Long Beach Airport.

Based on Caltrans traffic count data, the average daily traffic (estimated or actual) on streets nearest to Project sites varies depending on the nearby land uses. The average daily traffic was sorted based on nearby land use observed in aerial photograph images. In residential and residential/commercial mixed use areas, traffic counts range from approximately 3,800 to 9,000 vehicles per day. More urbanized settings, including dense commercial uses and office buildings, range from approximately 10,000 to 37,500 vehicles per day on streets nearest to proposed Project sites. Sites in more remote locations are along routes with generally fewer than 3,000 vehicles per day. The busiest arterial streets and highways near (but generally not adjacent to) proposed Project sites may exceed well over 100,000 vehicles per day. Table 3.12-1 identifies the LMR sites within 2 miles of a highway or roadway identified in the CMP.

3.12.1.2 Airports and Air Traffic

Los Angeles County is home to 15 public airports, 11 private airports, and more than 150 private heliports (Tollfree Airline 2014). Of the 26 airports, 15 are within the Los Angeles County Airport Land Use Commission jurisdiction (LACDRP 2009).

State law requires the creation of Airport Land Use Commissions (ALUCs) to coordinate planning for the areas surrounding public use airports. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the ALUC and for coordinating the airport planning of public agencies within the County. The ALUC is required to prepare and adopt a Comprehensive Land Use Plan for the airport area of influence to promote and ensure compatibility between each airport and surrounding land uses (Los Angeles County GIS Data Portal 2014).

Table 3.12-1 identifies proposed Project sites within 20,000 feet of the runways and landing/takeoff areas of airports, seaplane bases, or heliports. Distances listed from the nearest runway or landing/takeoff area are approximate. All of the general aviation, public airports in the County have runways that exceed 3,200 feet; however, several of the private airports open to the public have runways of less than 3,200 feet.

3.12.1.3 Mass Transit and Non-Vehicular Transportation

Forms of mass transit surface transportation in Los Angeles County include bus, rail, and ferry service to offshore islands. Buses use the network of highways and roadways. Rail service includes 73 miles of Metro Rail (which is between light rail and heavy rail systems), commuter rail, and intercity train services via Amtrak. In addition to ferry service to Santa Catalina Island, ships and boats travel into and out of the Port of Los Angeles and the Port of Long Beach.

At least 144 miles of bikeways traverse the County, and more than 800 miles of new bikeways are planned to be developed by 2032 (LACDPW 2012).

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
AGH	Agoura Hills	Yes	No	Agoura Hills Municode Weight Restrictions Agoura Hills General Plan Truck Routes LA County General Plan ¹ LA County Municode ²
AJT	AeroJet	No	No	County of San Bernardino General Plan ³ County of San Bernardino Municode ⁴
ASD	Auto Square Drive	Yes	Airports: Long Beach (18,800 ft.)	Cerritos General Plan Truck Routes Cerritos Municode Truck Routes Excavations LA County General Plan ¹ LA County Municode ²
BJM	Black Jack Peak	No	Airports: Catalina (7,400 ft.)	LA County General Plan ¹ LA County Municode ² (unincorporated area)
BUR	Burnt Peak	No	No	LA County General Plan ¹

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
				LA County Municode ² (unincorporated area)
BUR1	Burnt Peak-1	No	No	LA County General Plan ¹ LA County Municode ² (unincorporated area)
BUR2	Burnt Peak-2	No	No	LA County General Plan ¹ LA County Municode ² (unincorporated area)
BUR3	Burnt Peak-3	No	No	LA County General Plan ¹ LA County Municode ² (unincorporated area)
CPK	Castro Peak	No	No	LA County General Plan ¹ LA County Municode ² (unincorporated area)
DPK	Dakin Peak	No	Seaplane Base: Pebbly Beach (11,500 ft.) Avalon Bay (13,300 ft.)	LA County General Plan ¹ LA County Municode ² (unincorporated area)
ENC1	Encinal 1 (Fire Camp 13)	Yes	Heliports: LA Co. Fire Dept. (300 ft.)	LA County General Plan ¹ LA County Municode ² (unincorporated area)
ENT	Entrada Tank Site	Yes	No	Calabasas Land Use & Development Code Disaster Response Calabasas Municode Oversize Vehicles LA County General Plan ¹ LA County Municode ²
FRP	Frost Peak (Upper Blue Ridge)	Yes	No	LA County General Plan ¹ LA County Municode ² (unincorporated area)
FTP	Flint Peak	Yes	No	Glendale Municode Streets and Sidewalks Encroachments/Excavations LA County General Plan ¹ LA County Municode ²
GMT	Grass Mountain	No	No	LA County General Plan ¹

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
				<i>LA County Municode</i> ² (unincorporated area)
GRM	Green Mountain	No	No	<i>City of Los Angeles General Plan</i> Scenic Highways <i>City of Los Angeles Municode</i> Restricted Use of Certain Streets <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
H-17A	H-17A	Yes	No	<i>Whittier Municode</i> Street Use Restrictions Pedestrian and Vehicle Crossings <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
H-69B	H-69B	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
JOP	Josephine Peak	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
JPK	Johnstone Peak-1	No	No	<i>San Dimas Municode</i> Vehicle Weight Limits <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
JPK2	Johnstone Peak-2	No	No	<i>San Dimas Municode</i> Vehicle Weight Limits <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
LACF072	County FS 72	Yes	Heliports: LA Co. Fire Dept. (4,500 ft.)	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
LACFCP08	Camp 8	Yes	Heliports: Camp 8 (800 ft.)	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
LACFCP09	County CP 9	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
LACFCP11	County CP 11	No	Heliports:	<i>LA County General Plan</i> ¹

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
			Camp 11 (300 ft.)	<i>LA County Municode²</i> (unincorporated area)
LARICSHQ	LA-RICS Headquarters	Yes	Heliports: Los Angeles County Sheriff's Department (4,000 ft.)	<i>Monterey Park Municipal Code</i> Permit required for oversized and overweight vehicles <i>LA County General Plan¹</i> <i>LA County Municode²</i>
LEPS	Lower Encinal Pump Station	Yes	No	<i>Malibu Municode</i> No Additional Requirements <i>LA County General Plan¹</i> <i>LA County Municode²</i>
LPC	Loop Canyon	No	No	<i>LA County General Plan¹</i> <i>LA County Municode²</i> (unincorporated area)
MMC	Mount McDill	No	No	<i>Palmdale General Plan & Municode</i> No Additional Requirements <i>LA County General Plan¹</i> <i>LA County Municode²</i>
MML	Magic Mountain Link	No	No	<i>LA County General Plan¹</i> <i>LA County Municode²</i> (unincorporated area)
MTL2	Mount Lukens-2	No	No	<i>LA County General Plan¹</i> <i>LA County Municode²</i> (unincorporated area)
OAT	Oat Mountain-1	No	No	<i>LA County General Plan¹</i> <i>LA County Municode²</i> (unincorporated area)
PASPD01	Pasadena Police Dept.	Yes	No	<i>Pasadena Municode</i> Truck Routes Street and Sidewalks <i>LA County General Plan¹</i> <i>LA County Municode²</i>
PDC	Pacific Design Center	Yes	No	<i>West Hollywood General Plan</i> Truck Routes <i>LA County General Plan¹</i> <i>LA County Municode²</i>
PHN	Puente Hills	Yes	No	<i>LA County General Plan¹</i>

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
				<i>LA County Municode</i> ² (unincorporated area)
PMT	Pine Mountain	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
PWT	Portshead Tank	Yes	No	<i>Malibu Municode</i> No additional requirements <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
RIH	Rio Hondo	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
SDW	San Dimas	Yes	Airports: Brackett Field (9,700 ft.)	<i>San Dimas Municode</i> Vehicle Weight Limits <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
SGH	Signal Hill	Yes	Airports: Long Beach (4,600 ft.)	<i>Signal Hill General Plan</i> Scenic Routes Truck Routes <i>Signal Hill Municode</i> Trucks Commercial Vehicles Excavations <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
SIM	Simpsons' Building	Yes	Airports: Bob Hope Airport (19,600 ft.)	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
SPN	Saddle Peak	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
SUN	Sunset Ridge	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
SUN2	Sunset Ridge-2	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)

Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
TMT	Table Mountain	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
TOP	Topanga Peak	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
TPK	Tejon Peak	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
TWR	Tower Peak	No	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
VPK	VPK	Yes	No	<i>Glendale Municode</i> Streets and Sidewalks Encroachments/Excavations <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
WAD	Walker Drive	Yes	No	<i>City of Los Angeles General Plan</i> Scenic Highways <i>City of Los Angeles Municode</i> Restricted Use of Certain Streets <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
WMP	Whittaker Middle Peak	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
WS1	100 Wilshire	Yes	Airports: Santa Monica Municipal (13,100 ft.)	<i>Santa Monica Municode</i> Oversize vehicles Vehicle crossing Excavation <i>LA County General Plan</i> ¹ <i>LA County Municode</i> ²
WTR	Whittaker Ridge	Yes	No	<i>LA County General Plan</i> ¹ <i>LA County Municode</i> ² (unincorporated area)
ZHQ	Zuma Life Guard HQ	Yes	No	<i>Malibu Municode</i> No additional requirements <i>LA County General Plan</i> ¹



Table 3.12-1: Transportation Routes and Traffic Affected by Proposed Project Construction and Operations

Site ID	Site Name	County Congestion Management Highways or Roadways Within 2 Miles	Within Airport or Heliport Navigable Airspace (Approximate Distance)	Performance Standards of Highways, Roadways, Mass Transit, or Bicycle/ Pedestrian Paths in Established Plan, Ordinance, or Policy
				LA County Municode ²
<p>Abbreviations: Municode – Municipal Code; LA County - Los Angeles County; ft. - feet</p> <p>^{1.} LA County Municode includes road permit, excavation, undergrounding requirements for utilities along scenic highways and corridors, and weight restrictions.</p> <p>^{2.} LA County General Plan includes scenic highway requirements.</p> <p>^{3.} County of San Bernardino Municode includes road permit, excavation, undergrounding requirements for utilities along scenic highways and corridors, and weight restrictions.</p> <p>^{4.} County of San Bernardino General Plan includes scenic highway requirements.</p>				

3.12.2 Regulatory Setting

3.12.2.1 Federal Regulatory Setting

U.S. Department of Transportation

The National Highway Traffic Safety Administration, under the U.S. Department of Transportation, was established by the Highway Safety Act of 1970 to carry out safety programs under the National Traffic and Motor Vehicle Safety Act of 1966 and the Highway Safety Act of 1966. NHTSA is responsible for reducing deaths, injuries, and economic losses resulting from motor vehicle crashes by setting and enforcing vehicle safety performance standards and through grants to state and local governments to enable them to conduct effective local highway safety programs (NHTSA 2014). This includes establishing safety standards for commercial motor vehicles that may be used to transport equipment to proposed Project sites.

The FAA is charged with providing a safe and efficient aerospace system. To accomplish this, FAA’s rulemaking includes airspace as well as ground operations near airports and helipads, such as visibility of air traffic surface control areas. With regard to LMR facilities, the most applicable FAA regulation is Title 14 CFR Part 77, Objects Affecting Navigable Airspace, which requires that the administrator of the FAA must be notified by any person or organization who intends to sponsor construction or alterations exceeding 200 feet above ground level, as well as construction of alternatives in close proximity to an airport that may exceed certain heights (determined by the ratio of height/distance). In addition, FAA Advisory Circular AC 70/7560-1K, *Obstruction Marking and Lighting*, outlines standards for marking and lighting structures that exceed an overall height of 200 feet above ground level, to promote aviation

safety (FAA 2015). According to the advisory circular, a notice to the FAA Administrator is required if the proposed object would be more than 200 feet above ground level at its location or if it would be near a public-use or military airport, heliport, or seaplane base. Objects near an aviation facility are subject to the requirement when within:

- 20,000 feet of an airport or seaplane base with at least one runway exceeding 3,200 feet in length and the object would exceed a horizontal slope of 100:1 (100 feet horizontally for each 1 foot of vertical height) from the nearest point of the nearest runway
- 10,000 feet of an airport or seaplane base having no runway more than 3,200 feet in length and the object would exceed a 50:1 horizontal slope from the nearest point of the nearest runway
- 5,000 feet of a heliport and would exceed a 25:1 horizontal slope from the nearest landing and takeoff area of that heliport

Federal Communications Commission

While the FCC does not regulate transportation, it has the authority to require the painting and/or illumination of antenna towers when it determines that such towers may otherwise constitute a hazard to air navigation. The FCC's rules governing antenna tower lighting and painting requirements are based upon the advisory recommendations of the FAA. Although the FAA's lighting and painting standards are advisory in nature, the FCC's rules make the standards mandatory. The FCC always requires an FAA determination that an antenna tower will not pose an aviation hazard before it will grant permission to build that antenna tower, and it will not approve the construction permit unless the FAA determines that the structure would not be a physical hazard or the hazard has been mitigated by conforming to the FAA's painting and lighting recommendations (FCC 2014a).

3.12.2.2 State Regulatory Setting

California Department of Transportation

Variance Permit

Caltrans manages more than 50,000 miles of California's highway and freeway lanes. In accordance with Division 15 of the California Vehicle Code, Caltrans has the discretionary authority to issue special permits for the movement of vehicles/loads exceeding statutory limitations on the size, weight, and loading of vehicles. An application for a transportation permit is required when the hauled load exceeds 15 feet in width, 17 feet in height, and/or 135 feet in length (Caltrans 2014a). To be eligible for an oversize permit, the operator must demonstrate that the load cannot be reduced down and transported in a legal vehicle.

Encroachment Permit

The California Streets and Highways Code defines encroachment as any tower, pole, pole line, pipe, pipeline, fence, billboard, stand, or building or any structure that is in, under, or over any portion of the State highway rights of way. An encroachment permit must be obtained for all proposed activities that

encroach within, under, or over the State highway rights of way. Work that could require an encroachment permit includes movement or installation of utilities, excavations, vegetation trimming, and surveys (Caltrans 2014b).

California State Aeronautics Act

The purpose of the California State Aeronautic Act (Public Utilities Code [PUC] § 21001 et seq.) “...is to protect the public interest in aeronautics and aeronautical progress.” The Caltrans Division of Aeronautics administers much of this statute. Article 3.5, Airport Land Use Commissions, (PUC §§ 21670 – 21679.5) outlines the statutory requirements for ALUCs including the preparation of an Airport Land Use Compatibility Plan (ALUCP). Airport land use compatibility is the reconciliation of how land development and airports function together so that those uses that can coexist with a nearby airport without either constraining the safe and efficient operation of the airport or exposing people living or working nearby to unacceptable levels of noise or (safety) hazards.

3.12.2.3 Local Regulatory Setting

Los Angeles County Metro

Congestion Management Program

In 1990, the California Legislature enacted the Congestion Management Program (CMP) to implement Proposition 111, a state-wide transportation funding proposal that required local governments to implement mitigation measures to offset the impacts from new development on the regional transportation system. The CMP addresses the impact of local growth on the regional transportation system; the goal is to examine the interactions among land use, transportation, and air quality and to make decisions at the regional and local level in consideration of these interactions. Los Angeles County Metro is the designated agency responsible for implementing the CMP for Los Angeles County (Metro 2014).

When Level-of-Service (LOS) requirements are not maintained on portions of the CMP highway and roadway system, a deficiency plan is required that analyzes the cause of the deficiency and the implementation costs of various alternatives such as roadway modifications, programs, or actions to measurably improve performance. Highways must maintain at least LOS E, which is essentially one grade better than gridlock and is defined by a level of service where traffic flow fluctuates in terms of speed and flow rates, operating speeds average 35 miles per hour, and delays are significant. For arterial streets, LOS E occurs where long queues of vehicles are waiting upstream of an intersection and it may take several signal cycles for a vehicle to clear the intersection. A jurisdiction failing to comply with the CMP may have its allocation of the state gas tax withheld.

Los Angeles County Department of Public Works

The Los Angeles County Department of Public Works (LACDPWS) requires a road permit to perform work within County highways and roadways, in accordance with the Highway Permit Ordinance (Division 1 of Title 16 Los Angeles County Code). A permit may be required when a project would result in the

encroachment within, over, or under a highway; modification of storm drains; construction or maintenance of an overhead structure or other appurtenant facility; excavation for underground facilities; relocation of utilities; or impediment to travel (Los Angeles County Municode 2014a).

The operation of oversize vehicles is prohibited on certain highways in Los Angeles County, in accordance with the Vehicle and Traffic Ordinance (Division 1 of Title 15 Los Angeles County Code). This ordinance states that it is unlawful to drive, operate, or cause or permit to be driven or operated any commercial vehicle exceeding a gross weight of 14,000 pounds on any highways enumerated in Sections 15.48.065 through 15.48.299 of the code. Oversize loads transporting LMR monopoles and equipment would be restricted from using streets listed in the ordinance.

In addition, operation of vehicles in a bike lane is prohibited per Section 15.52.040, Title 15 of the Vehicle and Traffic Ordinance; exceptions are provided to cross at a permanent or temporary driveway or for the purpose of parking a vehicle where parking is permitted or where the vehicle is disabled (Los Angeles County Municode 2014a).

Los Angeles County, Department of Regional Planning

Chapter 9, Section VII Scenic Resources of the Los Angeles County General Plan describes the importance of preserving valuable designated scenic areas, vistas, and roadways. Three scenic highways — including segments of Angeles Crest Highway Route 2, Mulholland Highway, and Malibu Canyon-Las Virgenes Highway — are listed in Table 9.7 of the Plan (LACDRP 2015b). Utilities, including LMR station power supply cables, would require underground installation along these highway segments.

San Bernardino Association of Governments

Congestion Management Program

The designated Congestion Management Agency for San Bernardino County is the San Bernardino Associated Governments (SANBAG). The SANBAG Transportation Technical Advisory Committee meets every two years, at a minimum, with the General Policy Committee and Board of Directors. Together, they are responsible for the conformance monitoring and biennial updating of San Bernardino County's CMP.

San Bernardino County Department of Public Works

The San Bernardino County Department of Public Works (SBCDPW) requires a permit to perform work within county highways and roadways, in accordance with the Highway Permit Ordinance (Division 1 of Title 5 San Bernardino County Code). If required by the Road Commissioner, each applicant for a permit shall file proof of the applicant's right to use the highways for the purposes set forth in the application. A permit may be required when a project would result in any excavation or opening; fill or obstruction; or construction or repair in, over, along, on, across, or through any highway. Generally, a permit is required for any purpose, but exceptions may be made for, or in connection with, the installation of poles, guys, and anchors constructed for use under a franchise for public utility purposes where such

poles, guys, and anchors are located outside the paved or traveled portion of the highway (SBCDPW 2014).

In any permit issued, the Commissioner may specify what lights, barriers, barricades, warning signs, or other measures designed to protect the traveling public must be erected by the permittee. Pursuant to the Vehicle Code of the State of California, and upon the basis of a traffic engineering investigation, the Board of Supervisors may prohibit commercial vehicles exceeding a gross weight of 14,000 pounds from using any street, road, or highway in an unincorporated residential subdivision area and have signs erected to indicate such prohibition.

San Bernardino County Land Use Services Division

Chapter VI, Section B Countywide Goals and Policies of the Open Space Element (Goal OS 5.3) of the San Bernardino County General Plan describes the County's desire to retain the scenic character of visually important roadways throughout the county (San Bernardino County Land Use Services Division 2007). A "scenic route" is defined as a roadway that has scenic vistas and other scenic and aesthetic qualities that over time have been found to add beauty to the county. The Circulation and Infrastructure Background Report (Figures 2-4A through 2-4C of the Background Report) delineates which routes are scenic highways and applies all applicable open space policies to development on these routes. Utilities, including LMR station power supply cables, must be installed underground along these highway segments.

Cities

The proposed Project sites would be located within the jurisdictional boundaries of several cities located in Los Angeles or San Bernardino counties. Each city has adopted many of their respective county's performance standards for highways, roadways, transit, and bicycle/pedestrian paths by reference to the county codes in local general plan documents and municipal codes. Design and construction of the LMR sites would comply with four general categories of city standards: restricting heavy-weight vehicles to designated truck routes, requiring that utilities be installed underground when along scenic highways and corridors, maintaining vehicle and pedestrian access within the public right-of-way during excavation activities, and keeping disaster response routes open.

Table 3.12-1 lists the titles of city documents and performance standards that would impose additional restrictions on the siting of the proposed Project facilities within the jurisdictional boundaries for the city in which the Project site is located. In some cases, the city standards are identical to county standards but have a unique implementation measure or ordinance number and title. In other cases, the standards are unique to that city. Specific plan goals, implementation measures, and ordinances that embody these city standards are grouped below under one of the four general categories and for cities that have not established additional standards.

Vehicle Weight Restrictions – Heavy or Oversize Vehicles and Designated Truck Routes

Table 3.12-2 lists the cities in which Project sites are proposed and identifies the municipal code citation, when applicable, that restricts heavy-weight vehicles to designated truck routes. Routes designated as truck routes are specified in the municipal code or General Plans for most cities, although the truck route or routes with weight restrictions also may be specified through the posting of signs.

Table 3.12-2: Cities that Restrict Heavy-Weight Vehicles to Truck Routes

City Name	Municipal Code Citation	Weight Limit (gross pounds)	Exception for direct route access? ¹
Agoura Hills	Ordinance 3204 Amendments to Los Angeles County Traffic Code, Title 15, Division 1, Chapter 15.48 Weight Limits, Subchapter 060 and Ordinance 3207, Weight Limits on Certain Streets (Municode 2014c)	11,000	yes
Beverly Hills	Article 2, Commercial Vehicle Restrictions, 7-2-203. Streets Designated for Heavy Vehicle Usage (City of Beverly Hills 2014, <i>Municipal Code</i>)	6,000	Public utility vehicles used in construction, installation, or repair of utilities exempt
Calabasas	Chapter 10, Part 10, Oversized Vehicles, Requires permit to operate oversized vehicles on any public streets in the city; exceptions include vehicles used to construct, install or repair public utilities in the city	14,000	No, but may be specified in the permit
Cerritos	Chapter 10.18 Truck Routes, Maximum Gross Weight Limit: Designated Streets (City of Cerritos 2014, <i>Municipal Code</i>)	6,000	yes
Chino Hills	Title 10, Chapter 10.44, Vehicles and Traffic, Commercial Vehicles and Trucks (Municode 2014k)	10,000	yes
Glendale	Title 10, Vehicles and Traffic, Chapter 10.64.110, Truck Routes (Municode 2014d)	10,000	Exception for loading and unloading
Los Angeles	Chapter VIII Traffic, Division H, Restricted Use of Certain Streets (City of Los Angeles 2014a, <i>Charter & Administrative Code</i>)	6,000	yes
Malibu	None identified		
Monterey Park	Title 10, Chapter 10.44.020, Vehicles and Traffic, Truck routes and parking restrictions thereon	6,000	Not specified
Palmdale	Title 10, Chapter 15.102, Vehicles and Traffic, Prohibition of certain vehicles except on designated routes (City of Palmdale 2014b, <i>Municipal Code</i>)	10,000	yes
Pasadena	Title 10, Chapter 10.52 Vehicles and Traffic (Municode 2014g)	6,000	yes

Table 3.12-2: Cities that Restrict Heavy-Weight Vehicles to Truck Routes

City Name	Municipal Code Citation	Weight Limit (gross pounds)	Exception for direct route access? ¹
San Dimas	Title 10, Chapter 10.32.030 Vehicles and Traffic, Weight Limits, Truck Routes Designated (City of San Dimas 2014a, <i>Municipal Code</i>)	6,000	yes
Santa Monica	Article 3, Chapter 3.12.680 Public Safety, Traffic Regulations, Regulation of Operation of Vehicles Over a Certain Size (City of Santa Monica 2014a, <i>Municipal Code</i>)	6,000	yes
Signal Hill	Title 10, Chapter 10.36 Commercial Vehicles and Truck Routes (City of Signal Hill 2014b, <i>Municipal Code</i>)	6,000	yes
West Hollywood	None identified		
Whittier	Chapter 10.36.030 Restricted Use of Certain Streets, Truck Routes (Municode 2014e)	6,000	yes

¹ Exception for direct route access to and from restricted streets construction, alteration, or repair of any building or structure for which a building permit has previously been obtained

Other city policies or ordinances that pertain to the designation of truck routes or restrictions, heavy-weight vehicles, restrictions within business districts, or permits required for truck hauling activities follow.

City of Agoura Hills General Plan Update (2010)

- Mobility Implementation Program Measure 14 - Use of the designated truck routes for ongoing commercial and industrial business operations and during construction of new development

City of Cerritos General Plan (2004)

- Chapter 4, Section 3.2.6 Circulation Element, Truck Routes – Exhibit CIR-3 of General Plan identifies designated truck routes

City of Signal Hill General Plan (2009)

- Circulation Element, Truck Routes – designates streets for use by vehicles weighing three tons or more as truck routes, which are indicated by posted signs

City of West Hollywood General Plan 2035 (2011)

- Mobility Measure M-A.50 Truck Routes – identifies city-designated truck routes to discourage neighborhood intrusion

Scenic Highways and Corridors

City of Los Angeles General Plan (1999)

- Chapter V Section A. Transportation Element Maps, Scenic Highways
- Chapter VI Section D. View Street Designations and Standards, Scenic Highway Guidelines – undergrounding of utilities within 500 feet of centerline of scenic highway

City of Signal Hill General Plan (2009)

- Circulation Element, Scenic Routes – designates a series of roadways at higher elevations as scenic routes

Maintain Access during Excavation Activities

City of Cerritos Municipal Code (2014b)

- Chapter 12.16.160 Excavations, Lights, Barriers, Warning Lights Not Specified – permittee must place and maintain warning lights and signs at each end of an excavation or obstruction and at a distance of no more than 50 feet along the excavation/obstruction from sunset to sunrise until filled in or removed

City of Glendale Municipal Code (2014d)

- Title 12.08.130 (A)(B) Encroachments and Excavations, Protection of Public and Safety Requirements – maintain safe crossings for vehicles and pedestrians at intervals of not more than 300 feet, barriers at each end of excavation, and lights at 50-foot intervals from sunset to sunrise until excavation refilled

City of Los Angeles Municipal Code (2014)

- Chapter VI, Public Works and Property, Article 2, Streets and Sidewalks, Section 62.45(d) – requires permit fees for depositing and maintaining any protection fence, protection canopy, building material, debris or equipment, excepting cranes, in or upon any public streets, sidewalks or parkways

City of Pasadena Municipal Code (Municode 2014g)

- Title 12 Chapter 12.22.030 Streets and Sidewalks, Telecommunications Facilities, Prohibited on Roadway or Public Street – prohibits use or maintenance of any telecommunications facility which projects onto, in, or over any part of the roadway of any public street or which rests, wholly or in part, upon, along, or over any portion of the roadway of any public street

City of Santa Monica Municipal Code (2014a)

- Article 7, Chapter 7.04.230 Public Works, Streets, Sewers, Etc., Vehicle Crossing – requires the maintenance of safe crossings for vehicles and pedestrians at intervals of not more than 300 feet, providing free access to fire hydrants and water gates, and maintaining at least a 6-foot-

wide passage on sidewalks next to excavated materials and obstructions; barriers are to be placed at the end of and along the excavation or obstruction, and lighting is to be placed at intervals of not more than 50 feet from sunset to sundown so as to prevent accidents

- Article 7, Chapter 7.06.110 Right-of-Way Management Regulations, Excavation Permit Issuance – permits issued will not substantially interfere with pedestrian use of the public right-of-way or vehicular safety and may contain conditions relating to time, place and manner of use of the public right-of-way

City of Whittier Municipal Code (2014e)

- Chapter 12.24.090 Excavations Generally, Pedestrian and Vehicle Crossings – maintain safe crossings during excavations for vehicles and pedestrians at intervals not greater than 300 feet, maintain free access to fire hydrants and water gates

Maintain Disaster Response Routes

City of Calabasas Land Use and Development Code (2010)

- Chapter 17.20.080 General Property Development and Use Standards, Disaster Response – discretionary development projects will be required to provide points of ingress and egress, to include emergency access for police and fire vehicles

No Additional Goals, Policies, or Ordinances

- City of Malibu *General Plan (2013)* and *Municipal Code (2014b)*

3.12.3 Significance Criteria

The proposed Project would result in significant impact to transportation and traffic if any of the following significance criteria, based on Appendix G of the CEQA guidelines, are met:

- 1) Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- 2) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- 3) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- 4) Would the project result in inadequate emergency access?

Based on the Initial Study prepared for the LMR project (see Appendix A-2), it was determined that the Project would not result in increased hazards due to design feature or incompatible uses, it would have

no effect on public transit, bicycle or pedestrian facilities, and no further analysis of these topics is warranted within this EIR.

3.12.4 Impact Analysis

3.12.4.1 Proposed Project

TRANS-1: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impacts

Construction of a typical proposed Project site would take approximately six weeks. As shown in Table 2.1-4 in Chapter 2, Project Description, typical construction equipment required would include four-wheel drive vehicles, antenna and line trucks, water trucks, excavators, skidsters, cranes, forklifts, dump trucks, and concrete trucks. Some equipment would be transported to the construction site and remain there until no longer needed at the site. Other equipment would travel to and from the site on a daily basis throughout the construction period. Construction workers typically would travel to and from the work site via pickup truck. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the construction phase.

Of those proposed Project sites located within residential or mixed use areas, the construction related traffic would be less than 1 percent of the average daily traffic. In more urbanized areas, the construction-related traffic would be less than one-quarter of a percent of the average daily traffic. In more remote areas, construction related traffic could account for a higher percentage of the total average daily traffic (up to 9 percent in a few very isolated sites), but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Almost all proposed Project facilities would be constructed within or adjacent to existing telecommunications or other facilities; and construction of new facilities would occur within existing or extended fenced areas. Most large equipment would be transported without road closures. Temporary disruption of public access via vehicle, bicycle, or pedestrian route would be limited because most sites support existing infrastructure such as water tanks of telecommunications facilities, some work would be done within an existing fenced area that already prevents access, and excavated trenches typically would be backfilled in less than 48 hours.

Each of the proposed Project sites would be accessed via existing paved or unpaved roads. Precise access routes would be determined in coordination with equipment haulers and with local jurisdictions to identify the most suitable route. While precise routes are undetermined at this time, the nearest highway, nearest major arterial street, and the street most likely to provide immediate access to each

proposed Project site are provided in Chapter 4 to provide context of transportation routes that may be used. No road improvements or new road construction are anticipated.

Levels of use on nearby arterial streets and highways vary substantially, and some are part of the CMP. Major travel routes prone to congestion are a greater concern because construction traffic near these routes could further contribute to the congestion. Table 3.12-1 identifies the proposed Project sites within 2 miles of a highway or roadway identified in the CMP. When Project sites are located near these routes, it increases the likelihood that vehicles accessing the Project sites during construction or operations and maintenance phases would use a CMP route, incrementally adding to the volume of traffic that makes these routes congested. As previously noted, however, the additional volume of traffic would be less than 1 percent for the duration of site construction (about six weeks).

None of the proposed Project sites was identified to be in conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (e.g., mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths). Applicable plans, ordinances, and policies are listed in Section 3.12.2.3, including Table 3.12-2 and the policies following that table. The Project would not decrease the performance or safety of such facilities because the sites are either remote enough to have very little existing traffic, or the volume of construction traffic is small enough to equate to less than 1 percent of the average daily traffic. Access would be maintained for vehicles, bicycles, and pedestrians during construction. Construction of the Project would have less than significant impacts on the performance of the circulation system.

Mitigation Measures

No mitigation is required.

Operation Impacts

No staff would be required at any of the sites to operate the LMR equipment. The proposed Project facilities and equipment would need to be inspected, maintained, and repaired as necessary. Equipment replacement or repair that cannot be diagnosed and performed remotely may require a technician on site, typically in a standard van or utility pickup truck. This would occur on a monthly basis and include emergency generator testing and occasional refilling of the generator fuel tanks. Facilities and system components would be inspected annually, at a minimum, for common mechanical problems. Where replacement or repair involves installed antennas, a four-person crew with one truck, a boom (aerial lift) truck, and an assist van sport utility vehicle might be required.

Operations and maintenance of the proposed Project sites would not conflict with an applicable plan, ordinance, or policy (see “Cities” subheading in Section 3.12.2.3) that would influence the effectiveness of the circulation system. Traffic associated with operations and maintenance of each site is projected to be about four trips per month. Even in remote locations where average daily traffic counts are the lowest, operational impacts associated with the proposed Project would be in the thousandths of a percent of the existing average daily traffic. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

TRANS-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The 2010 Los Angeles County Congestion Management Program (CMP) sets forth specific requirements for preparation of a transportation impact analysis (TIA). The CMP requires preparation of a TIA for: (1) all CMP arterial monitoring intersections, including monitored freeway on-ramps or off-ramps, where the proposed Project will add 50 or more trips during either the AM or PM weekday peak hours; and (2) mainline freeway monitoring locations where the Project will add 150 or more trips in either direction during either the AM or PM weekday peak hours. As discussed in greater detail below, the proposed Project does not meet these thresholds; therefore, preparation of a TIA was not required.

Site AJT in San Bernardino County is approximately 5 miles from the nearest roadway identified in the San Bernardino County CMP. While the specific access routes to each proposed Project site have not been identified, the analysis was based on a site being within 2 miles of a CMP routes more than 2 miles from a site are viewed as less likely to be used. In addition, the threshold for a project triggering the need for a TIA report is 250 two-way peak-hour trips and the expectation that the project would add at least 50 two-way peak-hour trips to a State highway facility (SANBAG 2007). Therefore, Site AJT does not meet the criteria for contributing to levels of service on a CMP route and is not discussed further.

Construction Impacts

As listed in Table 3.12-1, about half of the proposed Project sites are more than 2 miles from routes identified in the local county Congestion Management Program. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible; and the effect would be less than significant.

The remaining sites are within 2 miles of a route identified in the local county CMP, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Construction impacts on CMP routes would be less than significant.

Mitigation Measures

No mitigation is required.

Operation Impacts

The effects associated with sites within 2 miles of a route identified in the CMP would be indistinguishable from existing levels of traffic on these routes because maintenance would typically generate no more than four round trips per month. The resulting change would be in the thousandths of a percent of the current average daily traffic. Operational impacts on CMP routes would be less than significant.

Mitigation Measures

No mitigation is required.

TRANS-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impacts

Construction and operation of the proposed Project sites would have no effect on the volume of air traffic; but lattice towers and monopoles (including associated equipment such as lightning rods) may be hazards to navigation, particularly when in close proximity to airports. The analysis considered the criteria identified in Title 47 Code of Federal Regulations, Part 17, Subpart B on FAA notification criteria for antenna structures, as well as the findings from running the landing slope facility calculator (TOWAIR) that is available on the FCC website. This tool determines if a proposed antenna structure is close enough to an airport or heliport to require an aeronautical study by the FAA and registration with the FCC. TOWAIR findings are not definitive or binding but are a good indication of interference with navigation that could affect air traffic patterns or pose a substantive safety risk. Certain antenna structures are exempt from FAA notification requirements, including an antenna structure of 6.10 meters (20 feet) or less in height except one that would increase the height of another antenna structure (47 CFR 17.7(e)(3)).

A preliminary analysis was completed using the TOWAIR tool; results are summarized in Table 3.12-3.

Table 3.12-3: Proposed Project Sites that May Be an Obstacle to Navigation for Air Traffic

Site ID	Site Name	TOWAIR Determination Results
	Agoura Hills	No airports within 5 miles
	AeroJet	No airports within 5 miles
	Auto Square Drive	No FAA requirement for Long Beach/Daugherty Field Airport or for Los Alamitos Army Airfield based on distance from runways
	Black Jack Peak	Requires FAA notification and FCC registration
	Burnt Peak	No airports within 5 miles
	Burnt Peak-1	No airports within 5 miles
	Burnt Peak-2	No airports within 5 miles
	Burnt Peak-3	No airports within 5 miles
	Castro Peak	No airports within 5 miles

Table 3.12-3: Proposed Project Sites that May Be an Obstacle to Navigation for Air Traffic

Site ID	Site Name	TOWAIR Determination Results
	Dakin Peak	Requires FAA notification and FCC registration
	Encinal 1 (Fire Camp 13)	No airports within 5 miles
	Entrada Tank Site	No airports within 5 miles
	Frost Peak (Upper Blue Ridge)	No airports within 5 miles
	Flint Peak	No airports within 5 miles
	Grass Mountain	No airports within 5 miles
	Green Mountain	No airports within 5 miles
	H-17A	No airports within 5 miles
	H-69B	No airports within 5 miles
	Josephine Peak	No airports within 5 miles
	Johnstone Peak-1	No FAA requirement for Brackett Field based on distance from runways
	Johnstone Peak-2	No FAA requirement for Brackett Field based on distance from runways
	County FS 72	No airports within 5 miles
	Camp 8	No airports within 5 miles
	County CP 9	No airports within 5 miles
	County CP 11	No FAA requirement for Agua Dulce based on distance from runways
	LA-RICS Headquarters	The structure meets the 6.10-meter (20-foot) Rule criteria
	Lower Encinal Pump Station	No airports within 5 miles
	Loop Canyon	No airports within 5 miles
	Mount McDill	No airports within 5 miles
	Magic Mountain Link	No airports within 5 miles
	Mount Lukens-2	No airports within 5 miles
	Oat Mountain-1	No airports within 5 miles
	Pasadena Police Dept.	No airports within 5 miles
	Pacific Design Center	No airports within 5 miles
	Puente Hills	No airports within 5 miles
	Pine Mountain	No airports within 5 miles
	Portshead Tank	No airports within 5 miles
	Rio Hondo	No FAA requirement for El Monte based on distance from runways
	San Dimas	Requires FAA notification and FCC registration
	Signal Hill	Requires FAA notification and FCC registration
	Simpsons' Building	The structure meets the 6.10-meter (20-foot) Rule criteria
	Saddle Peak	No airports within 5 miles
	Sunset Ridge	No airports within 5 miles
	Sunset Ridge-2	No airports within 5 miles
	Table Mountain	No airports within 5 miles

Table 3.12-3: Proposed Project Sites that May Be an Obstacle to Navigation for Air Traffic

Site ID	Site Name	TOWAIR Determination Results
	Topanga Peak	No airports within 5 miles
	Tejon Peak	No airports within 5 miles
	Tower Peak	No FAA requirement for Catalina based on distance from runways
	VPK	No FAA requirement for Bob Hope Airport based on distance from runways
	Walker Drive	No airports within 5 miles
	Whittaker Middle Peak	No airports within 5 miles
	100 Wilshire	The structure meets the 6.10-meter (20-foot) Rule criteria
	Whittaker Ridge	No airports within 5 miles
	Zuma Life Guard HQ	No airports within 5 miles

Based on distance and runway length (see Table 3.12-1) and TOWAIR results, the following proposed Project sites require FCC registration and FAA notification; and their construction would be a significant impact on navigation that could affect air traffic patterns or pose a substantive safety risk. An aeronautical study would be necessary to determine the actual degree of interference or safety risk. Existing communication towers at some of these sites suggest that navigational interference and safety risks may be within acceptable limits; consequently, the impact would be significant.

BJM Black Jack Peak

DPK Dakin Peak

SDW San Dimas

SGH Signal Hill

Mitigation Measures

Mitigation measure HAZ MM 2, described in Section 3.7.4.1, would be applied. This mitigation measure provides that the Authority would submit Form 7460-1, Notice of Proposed Construction or Alteration, to the FAA.

Impacts after Mitigation

For sites BJM, DPK, SDW, and SGH, FAA must be notified in accordance with 14 CFR Part 77. Prior to the start of construction, the Authority would complete Form 7460-1 and file it with FAA, which would trigger the FAA to complete an aeronautical study and return a hazard determination. If FAA approves construction, the Authority would build these structures in compliance with FAA's hazard determination and associated conditions from the aeronautical study (e.g., obstruction lighting). Application of HAZ MM 2 would ensure that the proposed Project complies with all FAA regulations and mitigates safety risks, reducing the impact to less than significant.

Operation Impacts

If FAA approves sites BJM, DPK, SDW, and SGH for construction, this would indicate that operation of the tower would not change air traffic patterns or result in substantial safety risks to flight operations. If approved by FAA, operation of these sites would have less than significant impacts on navigation that could affect air traffic patterns or pose a substantive safety risk.

Mitigation Measures

No mitigation measures are required.

TRANS-4: Would the project result in inadequate emergency access?

Construction Impacts

Construction-related traffic would be limited to 25 trips per day at each site and would be less than 1 percent of average daily traffic on nearby streets at most locations. At most Project sites, construction activity would affect access only to the site (e.g., the existing antenna farm or water tank site) and would not affect any adjacent roads that could be used for emergency access. At these sites, impacts would be less than significant.

In some of the urban locations, specifically sites ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, and ZHQ, construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact.

Mitigation Measures

The following mitigation measures would apply at sites ASD, LARICSHQ, PASPD01, PDC, SGH, SIM, WS1, and ZHQ.

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Impacts after Mitigation

With implementation of the proposed mitigation measures, temporary impacts on emergency access during the construction phase would be less than significant.

Operation Impacts

Vehicle trips associated with operations at each proposed Project site would be limited to those required for occasional inspections, maintenance, and repair. Up to four vehicle trips per month per Project site would occur during operations, equating to a change in the thousandths of a percent of the current average daily traffic. This would not be of sufficient volume to affect the level of service of any roadway. No impairment of access roads would be necessary during operations, and operational impacts on emergency access would be less than significant. In addition, with operation of the LMR system, communications for first responders would be enhanced and would provide opportunities for better communications associated with access during emergencies.

Mitigation Measures

No emergency access mitigation is required during the operational phase.

3.12.4.2 No Project Alternative

Under the No Project Alternative, no traffic would be added to CMP routes, no change would occur to existing structures that potentially may pose an obstruction to flight operations, and no change would occur in the volume of traffic or accessibility to disaster routes. Therefore, no impacts would occur to influence the traveling public.

First responders would continue to rely on existing communications facilities and equipment; emergency response times would be comparable to existing conditions, at least in terms on the reliability of the communications system.

3.12.5 Cumulative Impacts

The proposed Project is located within Los Angeles and San Bernardino counties. This cumulative impacts analysis considers the existing and future vehicle miles traveled (VMT) projections included in the Program EIR for SCAG's 2012-2035 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) adopted by the Regional Council of SCAG on April 4, 2012. Project types considered in the SCAG RTP/SCS including the following:

- Aviation
- Environmental Mitigation
- Goods Movement
- High-Speed Regional Transport
- Highways and Arterials

- Non-Motorized Transportation
- Transit
- Transportation Demand Management

Construction Impacts

According to the 2012 RTP/SCS Programmatic EIR, the total existing daily VMT in Los Angeles and San Bernardino counties as of 2011 was 285,322,000.¹⁴ (2012-2035 RTP/SCS Draft Programmatic EIR, Table 3.12-3.) In the City of Los Angeles General Plan Transportation Element, it was reported that more than 24.4 million trips per day occurred within the City of Los Angeles and more than 60.8 million trips per day occurred in Los Angeles County in 1990¹⁵ (City of Los Angeles 1999, Chapter II, Table 5). As discussed in Section 3.12.4, construction trips associated with the proposed Project would be limited to 25 trips per day per site. This amounts to approximately 40,500 construction-related trips over the two-year construction period spread across Los Angeles and San Bernardino counties for the 54 sites addressed in this Draft EIR. To the extent that Project construction overlaps with other projects in the same area, there is potential for a cumulative impact; however, the increase in daily trips associated with the Project represents less than .0007 percent of the 1990 County trips per day; therefore the proposed Project's contribution to cumulative impacts would not be cumulatively considerable.

In some locations, construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. This could result in temporary significant impacts that could impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access. If Project construction overlaps with other projects in the same area and impairs emergency access, the proposed Project would represent a cumulatively considerable contribution to inadequate emergency access. To address this issue, mitigation measures TRANS MM 1 and TRANS MM 2 would reduce the Project's contribution to cumulative impacts to less than cumulatively considerable.

Operational Impacts

Substantial growth and development is anticipated to occur within the SCAG region by 2035, and average daily VMT is expected to increase by 13.3 percent. While the SCAG Programmatic EIR concluded that this increase would be cumulatively significant, proposed Project operations would create only four trips per month, per site, or approximately 216 total trips per month (about 7 trips per day) for the 54 sites addressed in this EIR. These trips for maintenance and operation would be distributed across Los Angeles and San Bernardino counties and would be indistinguishable on any given day that maintenance activities would occur. The Project's contribution to significant transportation impacts would not be cumulatively considerable.

¹⁴ Use of a 2011 baseline is conservative, as VMT has increased and therefore Project construction trips would represent an even smaller percentage of total daily VMT in the two counties.

¹⁵ Use of a 1990 baseline is conservative, as the Census Bureau estimates the 1990 population of Los Angeles County at 8.9 million persons and the 2014 estimate at 10.1 million persons.

3.13 Utilities/Service Systems

This section describes existing utilities and service systems in the Project vicinity including solid waste management capacity and demand, water supply and demand, stormwater drainage, and wastewater treatment requirements and the regulatory requirements applicable to utilities and service systems. It also assesses the proposed Project's effects on these systems.

3.13.1 Environmental Setting

3.13.1.1 Solid Waste Disposal

The Los Angeles County Sanitation Districts (LACSD) operate a comprehensive solid waste management system serving the needs of a large portion of Los Angeles County. The County relies on a combination of publicly and privately owned and operated facilities to maintain a competitive environment for waste collection, recycling, and disposal.

Types of disposal facilities for nonhazardous waste within Los Angeles County include Class III landfills, which accept nonhazardous household waste, and unclassified landfills, which accept materials such as soil, concrete, asphalt, and other construction and demolition debris. As of December 31, 2013, the total remaining permitted Class III landfill capacity in the County was estimated at 113 million tons, after closure of Puente Hills Landfill on October 31, 2013 (LACDPW 2015). Based on solid waste generation, disposal trends, and existing County facilities, the cumulative need for Class III landfill disposal capacity (approximately 113 million tons) is projected to exceed the landfill capacity by the end of year 2025 (LACDPW 2015). Table 3.13-1 provides an overview of landfills nearest to the proposed Project sites, along with the determination of available capacity to serve the Project sites.

Table 3.13-1: Disposal Facility Locations

Landfills Serving Project Study Area	City Location	Number of Project Sites in Service Area	Maximum Daily Capacity (per Solid Waste Facility Permit; tons/day)	2012 Average Daily Disposal (tons/day)	Landfill Capacity Adequate for Solid Waste Disposal Needs?
Antelope Valley Recycling and Disposal Facility	Palmdale	4	1,800	822	Yes
Calabasas Landfill	Agoura	14	3,500	633	Yes
Chiquita Canyon Landfill	Castaic	7	6,000	2,971	Yes
City of Burbank Landfill #3	Burbank	5	240	107	Yes
Pebble Beach Landfill	Avalon	3	49	9	Yes
Savage Canyon Landfill	Whittier	12	350	250	Yes
Scholl Canyon Landfill	Glendale	5	3,400	675	Yes

Table 3.13-1: Disposal Facility Locations

Landfills Serving Project Study Area	City Location	Number of Project Sites in Service Area	Maximum Daily Capacity (per Solid Waste Facility Permit; tons/day)	2012 Average Daily Disposal (tons/day)	Landfill Capacity Adequate for Solid Waste Disposal Needs?
Sunshine Canyon City/County Landfill	Sylmar	4	12,100	7,107	Yes

Sources: LACDPW 2013; Grenoble 2013

3.13.1.2 Water and Wastewater Treatment

Los Angeles County is served by a complex water management system consisting of numerous water providers, water quality control boards, and other agencies. Los Angeles County's combination of local and imported water supply is delivered through a system of aqueducts, reservoirs, and groundwater basins. Approximately 33 percent of the water supply comes from local sources, including surface water from mountain runoff, groundwater, and recycled water. The remainder is imported into Los Angeles County from three sources: the Colorado River, the Sacramento-San Joaquin Delta in Northern California via the State Water Project, and the Owens Valley via the Los Angeles Aqueduct (LACDRP 2014a). The Metropolitan Water District of Southern California (MWD) is the largest regional water wholesaler in southern California. MWD delivers an average of 1.7 billion gallons of water per day to nearly 300 cities and unincorporated areas throughout southern California, primarily from the State Water Project and the Colorado River Aqueduct.

The LACSD operates 10 water reclamation plants (WRPs) and one ocean discharge facility (Joint Water Pollution Control Plant), which treat approximately 510 million gallons per day (mgd), 165 mgd of which are available for reuse (LACSD 2014).

Table 3.13-2 and Table 3.13-3 identify the local water service providers and wastewater systems, respectively serving the proposed Project sites.

Table 3.13-2: Domestic Water System Availability

Domestic Water Purveyor	Number of Project Sites in Service Area	Domestic Water Purveyor	Number of Project Sites in Service Area
City of Beverly Hills	1	City of Whittier	1
City of Cerritos	1	LA County Waterworks District #29	5
City of Glendale	2	LA County Waterworks District 40-34	1
City of Los Angeles	3	Las Virgenes Municipal Water District	7
City of Monterey Park	1	Roland Water District	1

Domestic Water Purveyor	Number of Project Sites in Service Area	Domestic Water Purveyor	Number of Project Sites in Service Area
City of Pasadena	1	Southern California Water Company	1
City of Santa Monica	1	Outside Established Service Areas	27
City of Signal Hill	1		

Source: Los Angeles County GIS Data Portal 2009

Table 3.13-3: Wastewater Treatment Plants in Study Area

Water Reclamation Plant	Location (city)	Total Permitted Capacity (mgd)
Joint Water Pollution Control Plant	Carson	400.0
Long Beach	Long Beach	25.0
Los Coyotes	Cerritos	37.5
Pomona	Pomona	15.0
San Jose Creek	Next to Whittier	100.0
Whittier Narrows	El Monte	15.0
Saugus	Santa Clarita	6.5
Valencia	Valencia	21.6
Palmdale	Palmdale	12.0

Source: LACSD 2014

3.13.1.3 Stormwater Drainage

Stormwater within Los Angeles County is primarily managed by the State Water Resource Control Board and the Los Angeles County Flood Control District (LACFCD). LACFCD is governed, as a separate entity, by the County of Los Angeles Board of Supervisors.

LACFCD encompasses more than 3,000 square miles, 85 cities, and approximately 2.1 million parcels of land. It includes the majority of drainage infrastructure within incorporated and unincorporated areas of the County, including 500 miles of open channel, 2,800 miles of underground storm drain, and an estimated 120,000 catch basins (LACFCD 2014). Cities within the Project area have separate stormwater drainage and sewer systems; stormwater is not processed at the wastewater treatment plants.

Stormwater runoff and compliance with NPDES permits and applicable State Water Resources Control Board requirements are addressed in the hydrology chapter of this document.

3.13.2 Regulatory Setting

This section is organized first by federal, state, and local setting and secondly by solid waste disposal, water and wastewater treatment, and stormwater drainage. Stormwater drainage is closely associated with water quality laws and regulations and may be discussed collectively.

3.13.2.1 Federal Regulatory Setting

Environmental Protection Agency

Resource Conservation and Recovery Act

Enacted in 1976 by the USEPA, the Resource Conservation and Recovery Act (RCRA) set national goals for protecting human health and the environment from the potential hazards of waste disposal, conserving energy and natural resources, reducing the amount of waste generated, and ensuring that wastes are managed in an environmentally sound manner.

Municipal solid waste landfills, which may be used for the disposal of waste materials from construction or maintenance of the Project sites, must comply with RCRA. Construction and demolition debris is neither classified as RCRA hazardous waste nor municipal solid waste, so construction and demolition landfills are not subject to federal design and operational criteria. If construction and demolition debris from the proposed Project sites is sent to municipal solid waste landfills or landfills that accept conditionally exempt small quantity generator waste (applicable for facilities that generate small amounts of hazardous waste), those landfills must still meet federal regulations set forth in RCRA (USEPA 2014b).

Clean Water Act, National Pollutant Discharge Elimination System

The Clean Water Act (CWA) of 1972 is the primary law governing water quality, including wastewater treatment. The provisions of the CWA are addressed in more detail in the water quality chapter of this document.

The CWA provides the statutory basis for the National Pollutant Discharge Elimination System (NPDES) permit program and the basic structure for regulating the discharge of pollutants from point sources to waters of the United States. The CWA gives the USEPA the authority to set effluent limits that ensure protection of the receiving water. In states that have been authorized to implement CWA programs, USEPA still retains oversight responsibilities.

Water pollution discharged from a single point, such as a pipe or from a municipal water treatment plant, is considered point source pollution. Most stormwater discharges are considered point sources and require an NPDES permit. This does not mean that all stormwater discharges contain pollutants; but because stormwater often flows over impervious surfaces, it may accumulate debris, chemicals, sediment, or other materials that are considered pollutants. Proposed Project sites with point source discharges would be subject to an NPDES permit.

3.13.2.2 State Regulatory Setting

California Department of Resources Recycling and Recovery

The California Department of Resources Recycling and Recovery (CalRecycle) is the state agency dealing with recycling and waste reduction, including compliance with the California Integrated Waste Management Act. CalRecycle mandates waste reduction targets for local agencies through the use of

recycling, recovery, and other waste reduction programs. CalRecycle also directs regional areas to develop plans for meeting the objectives outlined by the California Integrated Waste Management Act.

Hundreds of statutes pertain to solid waste law and specific types of waste streams (see <http://www.calrecycle.ca.gov/Laws/Legislation/CalHist/default.htm> for the history of California solid waste law). The important point with regard to the proposed Project sites is that all waste – whether construction and demolition debris, nonfunctional equipment, or trash generated by personnel working at the site – would be subject to proper disposal and transport to an appropriate waste landfill that complies with applicable waste regulations. Compliance with solid waste laws and regulations is the responsibility of the landfill operators. Therefore, disposal of Project waste materials would be processed by approved landfills designed to accept these types of waste.

California State Water Resources Control Board

The Porter-Cologne Water Quality Control Act (California Water Code, Division 7), which became effective January 1, 1970, revamped California’s water pollution law. The current law includes aesthetics and protection of fish and wildlife as beneficial uses of water to be protected, encourages area-wide planning for the solution to water pollution problems, recognizes the interrelationships of water quality and water quantity as expressed by water rights, and establishes the State Water Resources Control Board as the administrator of the related functions of water rights determination and water quality control.

The primary responsibility for the protection of water quality in California rests with the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs). The State Board sets statewide policy for the implementation of state and federal laws and regulations. The California State Water Resources Control Board (SWRCB) regulates wastewater discharges to surface water (rivers, ocean, etc.) and to groundwater (via land). The water boards also regulate stormwater discharges from construction, industrial, and municipal activities; discharges from irrigated agriculture; dredge and fill activities; the alteration of any federal water body under the CWA Section 401 certification program; and several other activities with practices that could degrade water quality.

3.13.2.3 Local Regulatory Setting

Los Angeles County

Solid Waste – Los Angeles County developed the Los Angeles County Integrated Waste Management Plan to accomplish the directives of the California Integrated Waste Management Act. The plan describes the steps to be taken by local agencies to achieve the mandated state diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste.

Water and Wastewater Treatment – The RWQCBs, which report to the SWRCB, adopt and implement Water Quality Control Plans (Basin Plans) that recognize regional differences in natural water quality, actual and potential beneficial uses, and water quality problems associated with human activities.

Most of the proposed Project sites are within the jurisdiction of the California SWRCB – Los Angeles Region; however, a number of Project sites are within the Lahontan Region. The LACDPW Water Quality Control Plan for the Los Angeles Region is the local regulatory plan for water and wastewater. It is designed as a resource for the Los Angeles RWQCB and others who use water and/or discharge wastewater within the Los Angeles Region. Water quality standards and control measures for surface and ground waters of the Lahontan Region are contained in the Water Quality Control Plan for the Lahontan Region (Basin Plan). The plan designates beneficial uses for water bodies and establishes water quality objectives, waste discharge prohibitions, and other implementation measures to protect those beneficial uses.

Stormwater Drainage – The LACDPW Stormwater and Runoff Pollution Control Program tracks industrial and commercial businesses in the unincorporated county area to determine compliance with the provisions of the Municipal NPDES Permit issued by the Los Angeles RWQCB (LACDPW 2014).

San Bernardino County

Solid Waste – The County of San Bernardino, Department of Public Works (SBCDPW), Solid Waste Management Division reviews and approves all new construction projects required to submit a Construction and Demolition Solid Waste Management Plan (waste management plan). The California Green Building Standards Code (CALGreen) requires all newly constructed buildings (including most nonresidential commercial projects) to develop a waste management plan and divert a minimum of 50 percent of the construction waste (that is reducing, reusing, recycling, diverting, and marketing solid waste). The waste management plan consists of two parts which are incorporated into the Conditions of Approval; the first part includes an estimate of the amount of tonnage to be disposed and diverted during construction, and the second part shows what tonnage was actually diverted and disposed of with disposal/diversion receipts or certifications for documentation (SBCDPW 2015a).

Water, Wastewater Treatment, and Stormwater Drainage – Prior to construction, project proponents are to prepare a Water Quality Management Plan and Stormwater Best Management Practices Transfer, Access and Maintenance Agreement (SBCDPW 2015b). The NPDES permit process addresses the SBCDPW's environmental needs regarding stormwater quality issues for San Bernardino County.

Cities

City regulations in the study area tend to be comparable to those described for Los Angeles County. Most cities provide waste collection services, and many have landfills or transfer stations. These cities also emphasize waste diversion programs to minimize waste going into landfills. Water supply policies often include use of reclaimed wastewater to help decrease demand on other water supplies. Stormwater management follows the regulatory processes established in applicable RWQCB Basin Plans.

3.13.3 Significance Criteria

The proposed Project would result in significant impact to utilities and service systems if any of the following significance criteria are met:

- 1) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- 2) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- 3) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- 4) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- 5) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Based on the Initial Study for the LMR project (see Appendix A-2) it was determined that project would not require construction or expansion of water or wastewater facilities or generate wastewater requiring treatment and no further analysis of these topics is warranted within the LMR EIR.

3.13.4 Impact Analysis

3.13.4.1 *Proposed Project*

UTL-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impacts

For building mounts and sites using an existing monopole or tower, wastewater is not anticipated because groundwater is not expected at the shallow depths of excavation associated with construction of these site types. During construction of deep foundations associated with new monopole or new tower locations, groundwater may be encountered for some excavation activities. For sites where dewatering during excavation is necessary, perched groundwater that may be encountered could be contaminated, have high levels of turbidity, or generally not meet other requirements for discharge to the environment. Unpermitted discharges to the environment could exceed treatment requirements of the RWQCBs and would be considered a significant impact.

When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the local RWQCB. Depending on the terms of the permit, the water may be discharged to storm drains. Because the proposed Project sites have separate storm drain and sewer systems, water discharged to storm drains in the Los Angeles Basin eventually leads to the ocean and would not be subject to treatment at a wastewater treatment plant. Temporary outflows associated with dewatering would be controlled so

that storm drain systems would not be overwhelmed and no expansion of storm drains would be required.

If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified in Table 3.13-3 would have the capacity to address the demand, as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measures

UTL MM 1: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction; and removal or discharge of water would be in accordance with the terms and conditions of the permit.

Impacts after Mitigation

The Authority will comply with all conditions and stipulations specified in the applicable permit. Because construction of the Project would be conducted in accordance with applicable stipulations and conditions in the applicable NPDES permit, the effect on wastewater treatment plants in the Project area during construction of the Project would be less than significant.

Operation Impacts

During operations, the Project would not result in the production of any wastewater, and there would be no impact on treatment requirements.

Mitigation Measures

No mitigation measures are required.

UTL-2: Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impacts

The proposed Project sites would be located at sites with existing communications towers, poles, equipment buildings, or other existing structures such as buildings or storage tanks and therefore would not require the addition of a substantial amount of impermeable surfaces. Some sites are already paved or on an existing building, and the amount of impermeable surface and runoff would be unchanged. At sites where surfaces are more natural, the Project would require grading and the addition of up to 4,000 square feet of impermeable surfaces that would increase stormwater runoff. Some of these sites, however, would be on granite mountain peaks where the natural surface is mostly impermeable, and drainage patterns and runoff would not appreciably change even with the introduction of paved surfaces. Additionally, where sites are in a more natural setting and more likely to require new

impermeable surface, up to 4,000 square feet in the context of the watershed, which may cover hundreds of square miles, is a very small area and would not change drainage patterns.

Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new stormwater drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites and effects on existing stormwater drainage facilities would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Any change in stormwater runoff as a result of the Project would occur in response to the establishment of foundations or other impervious surfaces during construction activities. While the impervious surfaces would remain through the life of the project, they would be designed to account for drainage requirements and existing drainage facilities. Therefore, operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

UTL-3: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impacts

Water for construction would be hauled to each site by water truck or water trailer. Sites requiring the greatest amount of ground disturbance are projected to require a maximum of 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction. Proposed Project sites that would be mounted on a building or sites where antenna would be added to an existing structure would likely require less water. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply of 165 mgd processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project, and construction impacts on water supplies would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Operation of the Project sites would require no water use; therefore, operations would have no impact on water supplies.

Mitigation Measures

No mitigation measures are required.

UTL-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impacts

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of CCR Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site. Construction impacts on landfill capacity would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Based on the identified applicable landfills for each Project site and the known capacity limits, maintenance of the proposed Project sites would not exceed the permitted capacity of the landfill(s) serving each site. Operational impacts on landfill capacity would be less than significant.

Mitigation Measures

No mitigation measures are required.

UTL-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impacts

Solid waste generated during construction and maintenance of the proposed Project sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of

solid waste generated; thus, construction of the proposed Project would have less than significant impacts related to solid waste statutes and regulations.

Mitigation Measures

No mitigation measures are required.

Operation Impacts

Solid waste generated during construction and maintenance of the proposed Project sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated; thus, operation of the proposed Project would have less than significant impacts related to solid waste statutes and regulations.

Mitigation Measures

No mitigation measures are required.

3.13.4.2 No Project Alternative

Under the No Project Alternative, no added consumption of water would occur; and no additional wastewater to treat or stormwater to drain compared to existing conditions would occur. No solid waste would be generated to dispose of in solid waste landfills. Therefore, no impacts would occur to influence the existing capacity of wastewater treatment facilities, stormwater drainage facilities, water supplies, or landfill capacity.

3.13.5 Cumulative Impacts

The cumulative effects analysis for utilities is based on regional plans including the County of Los Angeles Countywide Integrated Waste Management Plan 2013 Annual Report (LACDPW 2015b), the Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (SWRCB – Los Angeles 1994), and the Greater Los Angeles County Integrated Regional Water Management Plan (Greater Los Angeles County Integrated Regional Water Management Region 2014).

Wastewater

The geographic scope for evaluation of cumulative wastewater generation impacts is the boundaries of California RWQCB, Los Angeles Region. Because region-wide volumes of wastewater generated and projected increases in wastewater generation are not readily available, the determination of the significance of cumulative wastewater generation impacts is based on the capacity of existing wastewater treatment plants, which are designed to exceed the anticipated demand for the service area.

No new stormwater drainage facilities or expansions of existing facilities would be required as a result of construction and operation of the proposed Project sites. Additionally, new impervious surfaces created at individual project sites would be far below the general NPDES stormwater permitting thresholds of

1 acre that Los Angeles County (and some cities) have applied to manage stormwater in the Project area. As a result, the Project's contribution to cumulative impacts based on the need for infrastructure improvements would be less than significant.

Water Supply

The geographic area for evaluation of cumulative water supply impacts is the service area of the Metropolitan Water District of Southern California. Service area supply and demand volumes are not published because the volumes fluctuate with precipitation and dry periods. Therefore, the determination of the significance of cumulative water supply impacts is based on a comparison of water supply available in the geographic area. The mission of the MWD is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. The MWD is updating its Integrated Water Resources Plan, known as Water Tomorrow, to guide how water supplies are developed and managed. The goal of the plan is to meet all demands for water under a range of hydrologic conditions. The currently adopted 2010 Update of the Integrated Water Resources Plan has the goal of meeting full service demands at the retail level under all foreseeable hydrologic conditions; the plan also promotes planning for potential future contingency resources such as stormwater capture and large-scale water desalination. The additional use of up to 500 gallons of water over the course of a 45-day construction window at a Project site would temporarily add to existing water demand in the area. This level of demand is less than significant when compared with the 1.7 billion gallons of water supplied by MWD throughout southern California and the more than 632 mgd daily capacity of wastewater treatment plants serving proposed Project sites. An analysis of proposed projects within 2 miles of the Project sites addressed in this EIR reveal development plans for numerous residential homes, commercial retail space, industrial parks, restaurants, golf courses, and other projects with long-term water supply requirements (see Table 2.7-1). In comparison, the one-time use of 500 gallons of water for Project site construction is not cumulatively considerable.

Landfill Capacity

The geographic scope of cumulative analysis for landfill capacity is the service area for the landfills serving the proposed Project (see Table 3.13-1). The cumulative impact analysis was based on projections of future landfill capacity based on the entire projected waste stream going to these landfills. According to the County of Los Angeles, Countywide Integrated Waste Management Plan 2013 Annual Report (LACDPW 2015b), existing County landfill facilities are projected to accommodate solid waste disposal needs until the end of 2025, based on current solid waste generation and disposal trends. As noted in Table 3.13-1, the landfills servicing Los Angeles County may accommodate from 3 to 14 proposed Project sites, based on the typical landfill service area. Pebbly Beach Landfill, located on Santa Catalina Island, has the least remaining capacity at 93,000 tons and would serve up to three proposed Project sites. Project needs would be approximately .003 percent of available capacity at this site. Fourteen proposed Project sites are within the Calabasas Landfill services area; this landfill has more than 6.7 million tons of remaining capacity, and Project needs would be approximately .0002



percent of the remaining capacity. Therefore, because landfill capacity would be available through 2025, the cumulative effect of the proposed Project (which would be reduced based on compliance with applicable sections of the California Green Building Code), in combination with the projected waste stream going to landfills serving the Project, would be less than significant.

Project Description

Site ID: AGH

Site Name: Agoura Hills

Site Discussion:

Propose installation of up to 27 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Unnamed road – nearest intersection Kimberly Dr.

City: Agoura Hills

State: CA

Zip: 91301

Latitude: 34.159236896

Longitude: -118.770917835

Jurisdiction: City of Agoura Hills

Landowner: MORRISON ASSOCIATES

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

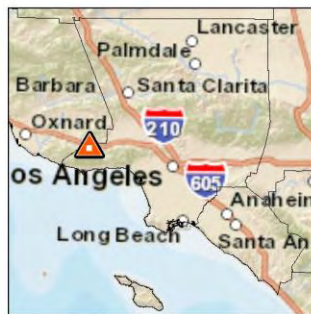
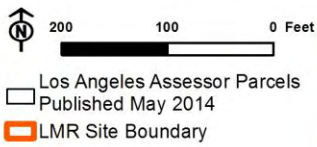
Existing Tower Type: Lattice (3) (two guyed)

Existing Tower Height: 30 feet (2), one (approx. 20')

Existing Site Use: Communications

Existing Ground Elevation (feet AMSL): 1364

AGH Site Boundary Map



AGH

Agoura Hills
Grey Rock Rd.
Agoura Hills, CA 91301

Proposed New Site Coordinates (NAD83):

Latitude: 34.159237
Longitude: -118.770927
Elevation (Feet): 1351

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



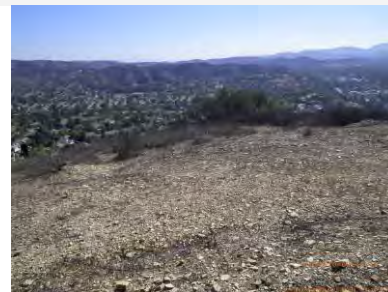
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The area surrounding project Site AGH is an urban residential area approximately 8 miles north of Highway 101 in Agoura Hills. The site is located on an undeveloped hilltop covered with low vegetation overlooking the residential areas to the east, south, and west. Views toward the site from roads and residences immediately below the site are primarily obscured by the steepness of the hill slope. Views farther from these roads within the residential areas are often obscured by mature landscaping. None of the buildings located in the immediate vicinity of the project site exceed three stories. Buildings in the vicinity of the project appear to be in excellent condition.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not be located in an area defined as scenic vista, and are not readily visible due to topography and the presence of mature landscaping. Locating the new tower and equipment at a site with existing structures would concentrate the impacts. The existing towers would attenuate the noticeability of new structures, thereby minimizing visual impacts. The new facilities would not block or remove views given the degree to which the facility is currently obscured by topography and vegetation. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no impacts to scenic vistas would occur.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site is low, and its surroundings are impacted by the presence of an existing site and two towers. Although the monopole and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 990

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site AGH. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site AGH or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1:

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Emissions from the construction of proposed site AGH would not exceed the SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of Nox from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site AGH will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site AGH would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site AGH or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site AGH, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site AGH, which is 990 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 6 are higher than the SCAQMD thresholds for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site AGH and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site AGH in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site AGH and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); golden eagle (*Aquila chrysaetos*; CDFW-FP); California Walnut (*Juglans californica*) Grove; Lyon's pentachaeta (*Pentachaeta lyonii*; FESA-E; CESA-E; CNPS-1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Agoura Hills General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California walnut [*Juglans californica* Woodland Alliance]; Association - *Juglans californica*-*Malosma laurina* (shrubland).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site AGH is located in the city of Agoura Hills at the end of a ridgeline within a largely undeveloped complex of hills surrounded by residential development; slopes are fairly steep and no washes are present. The vegetation community includes coastal sage scrub, California black walnut woodland on north-facing slopes with a few trees along the edge of the access road, and many weedy grasses and forbs throughout. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting. The project area is within the foraging range of the golden eagle (*Aquila chrysaetos*; CDFW-FP); eagles may pass by the project site while foraging, but the area around the study area does not provide steep cliffs or rocky crags used for nesting. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Sections 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. Though

habitat for the Lyon's pentachaeta (*Pentachaeta lyonii*; FESA-E; CESA-E; CNPS-1B.1) exists within 500 feet of the site. Suitable habitat consists of clay soil in grasslands or openings in coastal sage scrub and chaparral with very little competition from weedy annuals. Potential habitat in the project area would be on the north-facing slopes; Project activities would be limited to top of the hill; no habitat for this plant would be affected.

Mitigation Measure(s):

Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 19 Trenches and Holes Management • BIO MM 18 Nesting Bird Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protectio

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There are no riparian habitats within 500 feet of the project site. The California walnut grove vegetation community is found primarily down-slope on the north side of the existing facility, though a few trees along the edge of the woodland stand are adjacent to the access road.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use of heavy equipment near (within the dripline) walnut trees to protect the plant's root system. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of waters of the US, other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within open space designated by the City of Agoura Hills. The project may conflict with the Site AGH would be constructed at an existing communications facility containing three towers within open space designated by the city. The site is mostly bladed and contains nonnative grasses and a few scattered walnut trees, which are not specified for protection under the policy. In addition, BMPs identified to prevent runoff from the site would prevent potential erosion from the site. No conflict with Policy NR-4.2 has been identified. Construction would not result in conflict with the City's oak tree ordinance as there are no oak trees on site. Impacts from proposed Project construction on Policy NR-4.2 would be less than significant and there would be no impact associated with the City's oak tree ordinance. The proposed new antenna support structure at Site AGH increases the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on site, the lack of protected species known to occur near the sites, and the minimal activity associated with maintenance and repair activities, operations of the proposed project would have a less than significant impact on biological resources protected by the Agoura Hills General Plan. The Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such local plans, policies, and regulations are not applicable to the Project.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE); however, there are three archaeological sites situated in the indirect APE, one of which has been identified as an isolate, and all three of which are now buried beneath modern housing. The closest of the three to the direct APE is 1,125 feet. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, the distance of the three identified archaeological resources from the direct APE and their location beneath modern housing developments, there would be no impacts on historical resources from project activities at this project location.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE); however, there are three archaeological sites situated in the indirect APE, one of which has been identified as an isolate, and all three of which are now buried beneath modern housing. The closest of the three to the direct APE is 1,125 feet. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, the distance of the three identified archaeological resources from the direct APE and their location beneath modern housing developments, there would be no impacts on historical resources from project activities at this project location.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which is known to be fossiliferous. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include specimens of fish and primitive baleen whale. With implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring would be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect

areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: San Benito-Castaic-Calleguas-Balcom-Badland Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, fine-grained silty/clayey soils that have rapid runoff characteristics with moderately slow permeability. This condition increases erosion hazards in areas of sloping terrain; however, the proposed building site is on relatively flat grade. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local City planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features,

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program, City of Agora Hills 2035 General Plan

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site AGH and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site AGH was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site AGH. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site AGH would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site AGH, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site AGH would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Russell Valley

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Agoura Hills

General Plan Designation: Open Space-Deed Restricted

Zoning: Open Space-Deed Restricted

What is the zoning height restriction, if any?:

60 feet

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Agoura Hills

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 60 feet.

Exceptions to the ordinance may be allowed, ordinarily through a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Agoura Hills General Plan is not applicable and no conflict with the plan exists.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Agoura Hills

Applicable Noise Ordinance: Article IX - Zoning; Chapter 6 - Regulatory Provisions, Part 2 - Special Regulations; Division 6 - Noise Regulations

Noise Level Threshold: N/A; no construction from 8 pm to 7 am on weekdays, including Saturday, or at any time on Sunday or a legal holiday.

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar

to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56

dBa at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Camino El Real

Distance (Miles): 0.8

Disaster Route: Kanan Road and Highway 101

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Ventura Frwy

Distance (Miles): 0.8

Nearest Major Arterial: Thousand Oaks Blvd

Distance (Miles): 0.3

Access to the Project Site Provided Via: Kimberly Drive

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: AJT

Site Name: AeroJet

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on existing lattice tower without exceeding current overall height of the structure including appurtenances. Propose indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 2,000 square feet

Excavation: Up to 100 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures.

Address: Unnamed road – nearest intersection Woodview Rd

City: Chino Hills

State: CA

Zip: 91709

Latitude: 33.9483818431

Longitude: -117.744677294

Jurisdiction:

Landowner: AEROJET-GENERAL CORP

Proposed LMR Facilities

Antenna Support Structure: Existing Lattice Tower

New Support Structure Height: N/A

If Existing Structure is being used, is it FCC Registered?: Unknown

FCC Registration Number: Unknown

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

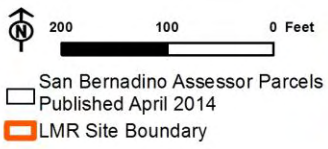
Existing Tower Type: Lattice

Existing Tower Height: 80'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1442

AJT Site Boundary Map



AJT

AeroJet

Soquel Canyon Rd. and Old Woodview Rd.
Chino Hills, CA 91709

Proposed New Site Coordinates (NAD83):

Latitude: 33.94838

Longitude: -117.744676

Elevation (Feet): 1453

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



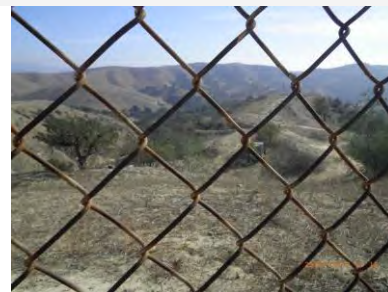
Site view looking north



Surrounding area north of site



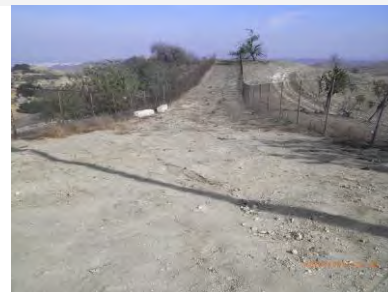
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

Site AJT is located in Chino Hills east of SR 142 and south of SR 71 in a lightly developed residential area consisting of hilly terrain. The site is on a high, sparsely vegetated and undeveloped hill top. A lattice tower with attached microwave dishes and two small one-story buildings exist. A few deciduous trees exist sporadically around the site. Small residential subdivisions exist to the north and west. A golf course and country club separate the site from the residences to the west. The site is visible from Palermo Drive, which is located just over 0.25-mile west of the site; however, no residences exist on Palermo Drive. New landscaping, which would eventually mature, exists between Palermo Drive and the site. The site is also visible from residences farther west of Palermo Drive on Milano Terrace, which is at a higher elevation, as well as from Catena Drive and Verona Court. None of the buildings located in the immediate vicinity of the project site exceed three stories. Buildings in the vicinity of the project appear to be in excellent condition.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Operational impacts would result from installation of the additional whip and microwave antennas to an existing tower, which already creates a visual intrusion onto the landscape in an area with few visual receptors. Given the distance of the existing tower from viewpoints or scenic vistas, the new antennas would not be noticeable. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no impacts to scenic vistas would occur.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site are low, and are already affected by the existing tower. The addition of new antennas to the existing lattice tower would not noticeably alter the site's visual character or quality. The same construction activities described for scenic vistas, described above, would also apply, with no change to the site's visual character.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 350

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site AJT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site AJT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site AJT would not exceed the SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of Nox from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site AJT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site AJT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site AJT or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site AJT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site AJT, which is 350 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 33 are higher than the SCAQMD thresholds for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site AJT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site AJT in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site AJT and all proposed Projects sites would not

include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

golden eagle (*Aquila chrysaetos*; CDFW-FP); long-eared owl (*Asio otus*; CDFW-SSC); western pond turtle (*Emys marmorata*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

California Walnut (*Juglans californica*) Grove

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

golden eagle - foraging (*Aquila chrysaetos*; CDFW-FP); long-eared owl (*Asio otus*; CDFW-SSC); California Walnut (*Juglans californica*) Grove

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Chino Hills General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California walnut [*Juglans californica* Woodland Alliance]; Association - *Juglans californica*-*Malosma laurina* (shrubland).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site AJT is located in a mostly rural setting in the city of Chino Hills on rolling hills of heavily grazed non-native grassland and sparse California Black Walnut (*Juglans California*) Woodland. Trees are generally denser on north-facing slopes. Non-native grasses and herbaceous species dominate the understory with milk-thistle (*Silybum marianum*), biennial mustard (*Hirschfeldia incana*), horehound (*Marrubium vulgare*), coyote melon (*Cucurbita foetidissima*), and Indian tobacco (*Nicotiana glauca*). The project area is within the foraging range of the golden eagle (*Aquila chrysaetos*; CDFW-FP); eagles may pass by the project site while foraging, but the area around the study area does not provide steep cliffs or rocky crags used for nesting. The study area is at the interface of rural and urban development with roads and various buildings in the vicinity. Eagles are sensitive to disturbance from human activities, and so the vicinity of the project site provides less than ideal eagle foraging habitat. Suitable

nesting and foraging habitat for the long-eared owl (*Asio otus*; CDFW-SSC) is found within the project area. Pre-construction surveys for nesting birds will be conducted; if nesting owls are located a 500-foot avoidance buffer will be implemented. No wetland habitats are present in the project area that would be suitable for the western pond turtle (*Emys marmorata*; CDFW-SSC) or least Bell's vireo (*Vireo bellii pusillus*; ESA-E CA-E). Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15 for non-raptors, and January 1 through July 31 for raptors. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. If nesting owls or eagles are located a 500-foot avoidance buffer will be implemented. • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There are no riparian habitats within 500 feet of the project site. The California walnut grove vegetation community is found primarily down-slope on the north and west sides of the existing facility, though a few trees along the edge of the woodland stand are adjacent to the access road.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Use caution to minimize the use heavy equipment near (with the dripline) walnut trees to protect the plant's root system. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The Chino Hills open space plan emphasizes, connecting trails, protecting large scale natural areas for wildlife, creating wildlife habitat, maintaining wildlife corridors, specialized use areas for gardens, grazing, golf, and community benefits such as recreation, camping and outdoor education. The site is presently located in an area used for grazing. Site is fenced and disturbed and would not interfere with present usages.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project activities have the potential to conflict with General Plan Policy CN-1.2 Preserve and protect Chino Hills' biological resources, however the proposed developments are an addition to the existing site facilities, and are consistent with current site usage; there would be no change in the nature of the on-site impacts.

Mitigation Measure(s):

Mitigation Recommended: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which is known to be fossiliferous. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the San Gabriel Valley region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Soper-Fontana-Calleguas-Balcom-Anaheim Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). Proposed whip antenna and microwave transmitters would be placed on existing lattice tower. A geotechnical report would not be required, however structural engineers would evaluate the existing lattice tower to determine if can safely support the proposed new equipment. Antennas would be collocated to existing lattice structure, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards such as landslides prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the

effects of seismic shaking or other geologic hazards would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, gravelly sandy clay loam that has a rapid runoff characteristics with moderately slow permeability. This condition increases erosion hazards in areas of sloping terrain; however, the proposed building site is on relatively flat grade. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local City planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Proposed antennas and microwave units are to be co-located to an existing tower, there fore no new structures would be built. There is no impact during construction, as no structures are being built.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site AJT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site AJT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site AJT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site AJT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site AJT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site AJT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Santa Ana

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting

process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Chino Hills

General Plan Designation: Undesignated

Zoning: Rural Residential

What is the zoning height restriction, if any?:

70 feet

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Chino Hills

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Chino Hills

Applicable Noise Ordinance: Title 8 – Health and Safety, Chapter 8.08 – Noise Control

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays and between 8:00 a.m. and 6:00 p.m. on Saturdays, excluding federal holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient

noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: Congestion Management Program for San Bernardino County

County Congestion Management Road or Highway: Carbon Canyon Road

Distance (Miles): 1.4

Disaster Route: No published route identified

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Corona Frwy

Distance (Miles): 1.67

Nearest Major Arterial: Grand Ave

Distance (Miles): 3.58

Access to the Project Site Provided Via: Woodview Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles

bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: ASD

Site Name: Auto Square Drive

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long brick wall to match existing wall. Propose installation of up to 3 HVAC units. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 18605 Studebaker Rd

City: Cerritos

State: CA

Zip: 90703

Latitude: 33.862

Longitude: -118.1018

Jurisdiction:

Landowner: City of Cerritos

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

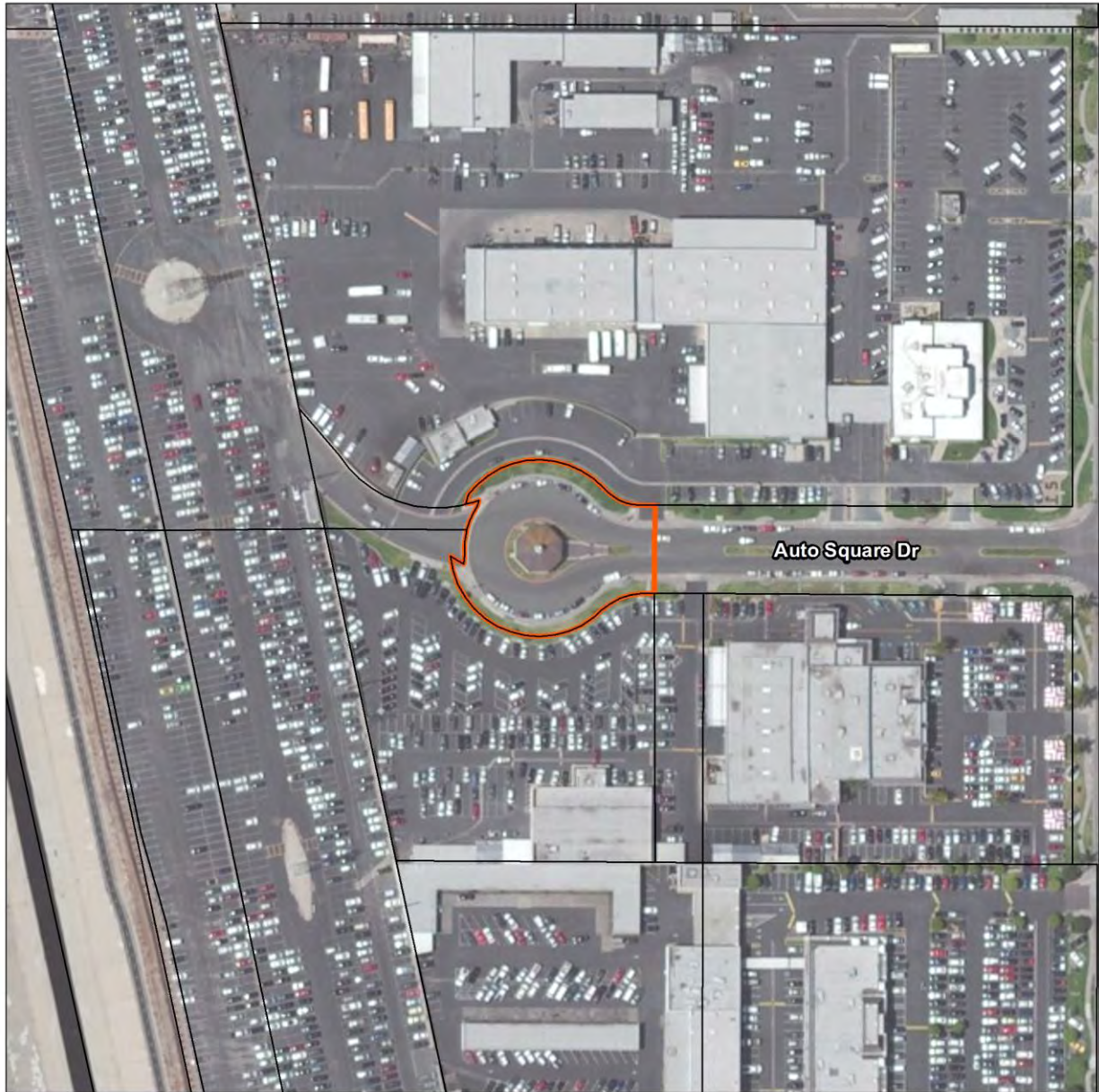
Existing Tower Type: N/A




Existing Tower Height: N/A

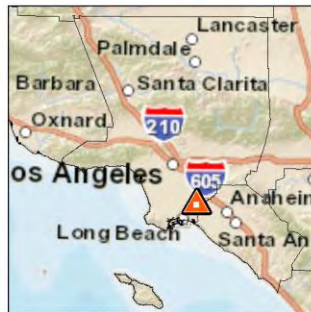
Existing Site Use: Commercial/Retail Area

Existing Ground Elevation (feet AMSL): 59

ASD Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



ASD

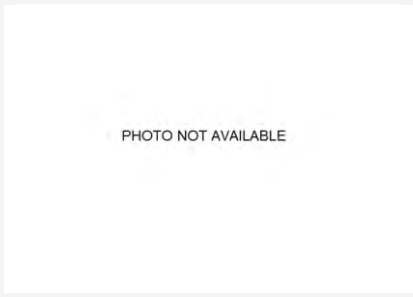




Auto Square Drive
18605 Studebaker Rd.
Cerritos, CA 90703

Proposed New Site Coordinates (NAD83):

Latitude: 33.86191
Longitude: -118.101671
Elevation (Feet): 56

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..

 <p>PHOTO NOT AVAILABLE</p>	<p>Site view looking north</p>	 <p>Surrounding area north of site</p>
 <p>Site view looking south</p>	<p>PHOTO NOT AVAILABLE</p>	<p>Surrounding area south of site</p>
<p>PHOTO NOT AVAILABLE</p>	<p>Site view looking east</p>	 <p>Surrounding area east of site</p>
 <p>Site view looking west</p>	<p>PHOTO NOT AVAILABLE</p>	<p>Surrounding area west of site</p>

Aesthetics

Setting

Visual Description:

The site consists of a gazebo-like structure set within a roundabout in Auto Square Drive, which is in an enormous car dealership area. The site is nearly completely surrounded on all sides by a plaza that contains multiple car dealerships and encompasses nearly the entire surrounding 0.25-mile radius. Large multi-story dealership buildings occur within this plaza, which often block views of the gazebo. The channelized San Gabriel River constitutes the plaza's western border. A residential area exists west of the river, consisting of modest 1- and 2-story, tightly-spaced houses behind a screen of tall evergreen vegetation that lines the street. A greenspace and small park occupy a small sliver of land between the houses and river at the far southwestern section of the 0.25-mile radius. Beyond the greenspace, the ground slopes upward at the channel's edge, which is lined by a chain link fence. Transmission lines comprised of lattice towers and telephone poles, both carrying multiple sets of wires, parallel either side of the concrete river channel.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a highly developed commercial urban setting within a large automobile dealership complex. The site is not within a scenic vista or within view of one.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a highly developed commercial urban setting within a large automobile dealership complex, with low visual quality. The new structures would be compatible with the visual character of the existing site and the commercial setting, particularly given the presence of numerous motor vehicles, dealership buildings, transmission lines, telephone poles, and utilitarian commercial buildings.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Kiosk

Distance to Sensitive Receptor: 20

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site ASD. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site ASD or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site ASD would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site ASD will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site ASD would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site ASD or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site ASD, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site ASD, which is 20 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 4 are higher for CO and lower for NO_x, PM₁₀, PM_{2.5} than the SCAQMD thresholds but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site ASD and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site ASD in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site ASD and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; ESA-T, CA-E)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Cerritos General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Urban

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site ASD is located in a highly urbanized setting with extensive paved surfaces and minimal lawn and landscape vegetation within the Cerritos Auto Mall. No suitable riparian habitat for the western yellow-billed cuckoo (*Coccyzus americanus occidentalis*; ESA-T, CA-E) is found within the project area. The area is fully paved, with minor amount of lawn.

Mitigation Measure(s):

None required.

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, the boundaries of this wetland type are located along the concrete-line bank of the San Gabriel River and entirely within a paved area. Adverse impacts to this wetland may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Cerritos General Plan does not include policies to protect biological resources.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research conducted in May 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as low sensitivity younger Quaternary alluvial sediments at the surface. However, these deposits typically overlie older geologic units that may contain significant vertebrate fossils at depth. No localities are recorded within the proposed site; however, fossil localities have been recorded in similar Quaternary sediments throughout the Los Angeles Basin at depths as shallow as two to eight feet. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site when excavation depths exceed five feet. Periodic paleontological spot checks are required when excavation exceeds depths of five feet into the Quaternary alluvium to determine if older, paleontologically sensitive sediments are present. If present, monitoring would be conducted during excavation into paleontologically sensitive sediments to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 for the overlapping LPK project location and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate pending geotechnical investigation

Soil Type: Urban land-Sorrento-Hanford Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: Yes

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking including liquefaction. GMED may require special foundation requirements, such as spread footings, deep piles, or other modifications to the foundation to reduce potential

effects of liquefaction. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Soil type would be determined upon completion of geotechnical analysis. However, there is a Less than Significant impact to soil erosion since the proposed site is surrounded by asphalt and concrete surfaces. Potential for soil erosion is limited to construction activities, when there may be a Less than Significant impact to erosion resulting from exposed soils during construction. However, the proposed building site is on relatively flat grade. Building permits require that standard BMPs for erosion control be put in place on all projects. All exposed surfaces from the construction of the project would be covered in hard surfaces once complete. Construction plans are reviewed by the issuing agency for the building permit, to ensure proper drainage is maintained and directed towards existing storm drain inlets.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking including liquefaction. GMED may require special foundation requirements, such as spread footings, deep piles, or other modifications to the foundation to reduce potential effects of liquefaction. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard

has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site ASD and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site ASD was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site ASD. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site ASD would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site ASD, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site ASD would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR Site is within 1/4 mile of 5 permitted USTs and 2 open LUST

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Coastal plain of Los Angeles

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Site ASD is within 500 feet of an aqueduct, but the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Cerritos

General Plan Designation: ADP-5 Cerritos Auto Square

Zoning: Auto Mall/ Restricted Commercial

What is the zoning height restriction, if any?:

85 feet

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Cerritos

Los Angeles County Community or Area Plan: Gateway Planning Area

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site would not be inconsistent with the applicable Los Angeles County General Plan policies.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Cerritos

Applicable Noise Ordinance: Cerritos Municipal Code, Chapter 22.80 - Environmental Performance Standards, Section 480 - Noise

Noise Level Threshold: N/A; no construction from 7 pm to 7 am

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient

noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Interstate 605

Distance (Miles): 0.22

Disaster Route: Interstate 605

Transit, Bicycle, or Pedestrian Facilities: San Gabriel River Trail, LA Metro West Santa Ana Branch

Within Vicinity of Aviation Facility: Approximately 21,900 feet from runway at Long Beach Municipal Airport

Nearest Highway/Freeway: Interstate 605

Distance (Miles): 0.23

Nearest Major Arterial: Studebaker Road

Distance (Miles): 0.1

Access to the Project Site Provided Via: Auto Square Drive

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site ASD is approximately 19,000 feet from Long Beach Airport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, antennas mounted to a 70-foot-tall monopole), the TOWAIR tool indicates that the antenna structure is a “pass slope determination,” which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: City of Cerritos

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: BJM

Site Name: Black Jack Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Near Airport Rd.

City: Santa Catalina Island

State: CA

Zip: 90704

Latitude: 33.3868620075

Longitude: -118.401100568

Jurisdiction:

Landowner: Santa Catalina Island

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

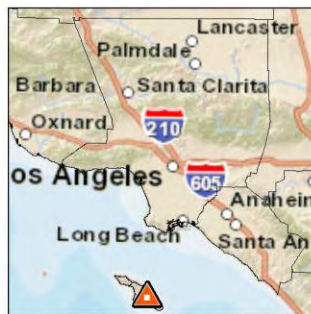
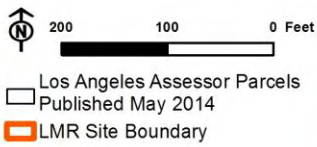
Existing Tower Type: Lattice

Existing Tower Height: 125'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 2008

BJM Site Boundary Map



BJM

Black Jack Peak
Near Airport Rd.
Unincorporated, CA 90704

Proposed New Site Coordinates (NAD83):

Latitude: 33.386913
Longitude: -118.401143
Elevation (Feet): 2004

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



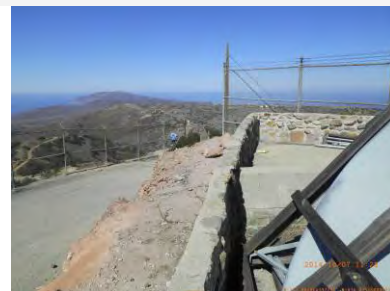
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The Black Jack Peak site is approximately 0.25 mile east of and above Blackjack Campground, which is located about 1,600 feet above sea level on Catalina Island. The site is in proximity to Catalina Island's primary road. A large red and white lattice tower with some attached microwave dishes exists on site adjacent to a large one-story equipment shelter. The area consists of pine and eucalyptus trees. Vegetation is primarily low and none is tall enough to obscure the site. A stone wall surrounds part of the site, which is enclosed by a chain link fence. The existing tower is a predominant feature on a tall ridge top, with no tall surrounding vegetation or other visual obstructions. Vegetation around the site is low and sparse. The campground provides "sweeping views" of rolling terrain to the ocean (Santa Catalina Island Co n.d.). Views from the campground are dominated by rolling terrain, canyons, and panoramic views out to sea (Catalina Island Explorer n.d.). The site would be in view of the Trans Catalina hiking trail to the south. Although it has no official scenic designation, the 37-mile Trans-Catalina trail, completed in 2009, traverses Catalina Island in its entirety and offers "spectacular views across the 43,000-acre Nature Preserve of the Catalina Island Conservancy known as Catalina's 'Interior'." Cyclists are permitted on the East End portion. Visitors hike a single section of the trail, or hike the entire route over multiple days (Catalina Island Conservancy 2015). In addition, another hiking trail/service road bypasses the site to the north, and the island's primary road is about 0.3 mile to the east (Catalina Chamber n.d.). Sensitive viewers would be campers, hikers, and visitors traveling the primary road

Visual Sensitivity: High

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Catalina Island Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Trans-Catalina Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes an existing tower that already creates a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structure. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be

barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. The site is located adjacent to the Trans Catalina hiking trail. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts that would occur on weekdays when visitation to Catalina Island, the campground, and the Trans Catalina Trail would be lower.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and large lattice tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations

safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Campsite

Distance to Sensitive Receptor: 1654

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site BJM. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site BJM or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site BJM would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site BJM will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site BJM would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site BJM or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for Nox, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site BJM, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site BJM, which is 1,654 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site BJM and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site BJM in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site BJM and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators

and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat (*Corynorhinus townsendii*; CA-PT; CDFW-SSC); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); groundfish (M&F-EFH)

Special Status Plants Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); California dissantheium (*Dissantheium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); island rush-rose (*Crocantemum greenii*; ESA-T, 1B.2); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp *floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1); south island bush-poppy (*Dendromecon harfordii* var. *rhamnoides*; 3.1); Wallace's nightshade (*Solanum wallacei*; 1B.1)

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat - foraging (*Corynorhinus townsendii*; CA-PT; bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&F-EFH); dissantheium (*Dissantheium californicum*; 1B.2); round-leaved filaree (*California macrophylla*; 1B.1); Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1); round-leaved filaree (*California macrophylla*; 1B.1); island rush-rose (*Crocantemum greenii*; ESA-T, 1B.2); Wallace's nightshade (*Solanum wallacei*; CNPS-1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

Santa Catalina Island Open Space Easement (Santa Catalina Island Conservancy); SEA/CRA – Santa Catalina Island; SEA – Swain's Canyon; SCAG Zoning - Wildlife Preserves and Sanctuaries

Local Policy or Ordinance for Biological Resources:

Santa Catalina Island Local Coastal Program

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Coastal prickly pear scrub [*Opuntia littoralis* shrubland Alliance]; Association- *Opuntia littoralis*-mixed coastal sage scrub (Chaparral).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site BJM is located on Black Jack Peak on Santa Catalina Island on hill top that has been leveled and mostly paved to support of the existing facilities. The vegetation in the area has been heavily impacted by overgrazing and long-term drought resulting in bare soil and an increase in non-palatable plant species. Adjacent to the site is coastal sage scrub bisected by hiking trails and bike paths. Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T) may occur throughout the area. Townsend's big-eared bat (*Corynorhinus townsendii*; CA-PT; CDFW-SSC) may forage in the project area, but no potential roost sites of caves or mines are known to occur in the project area. Bald eagles (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) nest on Catalina Island and may occur throughout the area; Site BJM is about 1 mile from the Twin Rocks bald eagle nesting territory (one of 8 nesting territories on Catalina Island in 2014). Project activities are not in the vicinity of potential nest sites and do not interfere with foraging habitat along the coast. No riparian/aquatic habitat suitable for two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC) occurs in the project area. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline within the project area; no project activities would impact marine environments. Twelve sensitive plant species have been recorded from the area. The survey conducted on 10/7/14 was too late in the season to identify any of the three annuals: dissanthelium (*Dissanthelium californicum*; 1B.2), round-leaved filaree (*California macrophylla*; 1B.1), and Santa Cruz Island rockcress (*Sibara filifolia*; ESA-E, 1B.1). The beach spectacle pod (*Dithyrea maritima*; CA-T, 1B.1) grows on beach sand dunes; no habitat present in project area. The dissanthelium (*Dissanthelium californicum*; 1B.2) is a native annual grass that grows on mesic sites in canyons, especially after fires. This species is extremely rare and can only be identified after adequate spring rains. No habitat occurs in the project area. The round-leaved filaree (*California macrophylla*; 1B.1) usually occurs in grassy depressions in clay soils. Because it can grow in disturbed conditions its presence or absence would be determined by a spring survey. The crossosoma and island rush-rose are perennials. The crossosoma is a perennial shrub that is most common in narrow canyons and north-facing slopes and was not present within the survey area; suitable habitat is not present in the project area. The island rush-rose (*Crocanthemum greenii*; ESA-T, 1B.2) is a small perennial that could re-sprout and be observable after spring rains following fires. Suitable habitat for this species, includes dry slopes, washes in coastal sage scrub, and desert transition chaparral. Suitable habitat is present in the project area. It has been collected at the foot of Black Jack Peak in 2013. Santa Catalina figwort (*Scrophularia villosa*; 1B.2) and Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2) grow in mesic canyons; no suitable habitat is present in the project area. Santa Catalina Island ironwood (*Lyonothamnus floribundus ssp floribundus*; 1B.2) is a tree and would be observed during the survey. Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2) and south island bush-poppy (*Dendromecon harfordii* var. *rhamnoides*; 3.1) are distinctive shrubs and would be observed during the habitat assessment. Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1) occurs on rocky volcanic slopes within coastal scrub. A survey in 1901 and 1973 located this plant within 3 miles of the project site; a 1997 survey did not locate plant. Wallace's nightshade (*Solanum wallacei*; 1B.1) occurs on rocky sites within chaparral; could be eliminated by overgrazing and might be observed after spring rains. Not observed during site surveys, but potentially suitable habitat is present. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Worker environmental awareness training would be required for all construction employees. Prior to initiation of construction activities, the project area is to be inspected for the presence of fox dens; if a den is located no construction activities would be initiated and USFWS would be contacted. Sites that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) would be inspected prior to moving. Manage trenches so as not to trap wildlife. Conduct spring botanical surveys for dissanthelium (*Dissanthelium californicum*; 1B.2), round-leaved filaree (*California macrophylla*; 1B.1), Santa Cruz Island winged-rock cress (*Sibara filifolia*; ESA-E, 1B.1), round-leaved filaree (*California macrophylla*; 1B.1), Wallace's nightshade (*Solanum wallacei*; 1B.1), and island rush-rose (*Crocanthemum greenii*; ESA-T, 1B.2); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site

construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the Santa Catalina Island (Swain's Canyon) Coastal Resource Area and SEA. This CRA provides unobstructed wildlife movement throughout its open spaces mainly in drainages and along ridgelines and dirt roads. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. Blackjack Mountain is listed one of the 37 SEA's on the island.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Construction at the proposed Project site may conflict with policies described in California Public Resources Code Section 30240, and with specific policies contained in the Santa Catalina Island Local Coastal Plan. Construction activities on site could potentially degrade habitat values (as discussed in Impact BIO 1) in Environmentally Sensitive Habitat Areas (ESHAs), which would in turn conflict with the California Public Resources Code that precludes these ESHA impacts, and thus conflict with the Santa Catalina Island Local Coastal Plan. These conflicts would be precluded by the measures identified in Impact BIO 1. Specifically identified within the Santa Catalina Island Local Coastal Plan: • Policy 3 of the plan prohibits introduction of non-native animals to Santa Catalina Island and workers bringing pets to the site could potentially create conflict, but application of BIO MM 10, No Pets would preclude these impacts. • Policy 11 requires procedures for grading and other site procedures to minimize erosion, but BMPs to be applied at every site are designed to prevent any erosion from the site. • Proliferation of non-native weeds (considered in Policy 20) would be precluded by application of BIO MM 24, Prevent the Spread of Non-native Vegetation. Impacts associated with construction would be less than significant with mitigation. Operational activities at the site would not alter habitats, and thus would not result in any substantive conflict with existing local policies or ordinances. Impacts would be less than significant.

Mitigation Measure(s):

Incorporation of mitigation measures identified at Impact BIO-1 and application of BIO MM 10 and BIO MM 23 would preclude impacts to sensitive species, thereby avoiding or reducing construction impacts, and in turn avoiding or reducing conflicts with the Santa Catalina Island Local Coastal Plan. This would be verified by application of LU MM 1, which would require the Authority obtain a coastal development permit prior to construction at the site. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Tertiary volcanic flow rocks, unit 8 (Southern California Basin)

Stability: Moderate to High pending geotechnical analysis

Soil Type: Xerorthents-Thirst-Shoba-SanClemente-Rock outcrop-Eelpoint Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, stony/cobbly silt loam that has a moderate runoff characteristics and slow permeability. This condition caused little to no erosion hazards. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local City planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site BJM and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site BJM was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site BJM. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site BJM would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site BJM, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site BJM would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: Catalina Airport

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site: Yes

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None Required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: None identified.

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Catalina Island Coastal Zone

Is the site located within a Airport Land Use Plan area?: No, but approximately 7,400 feet from Catalina Airport in the Sky

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Catalina Island Land Use Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposal for this site is to construct a new up to 180-foot-tall lattice tower on land within the Santa Catalina Island Coastal Zone. Existing communication facilities occur at the site. The Local Coastal Plan policies discourage the siting of facilities, such as communications facilities, in high-visibility locations. New development is to be attractively designed to protect highly scenic natural or historical areas. The proposed lattice tower, sited in close proximity to existing facilities, helps to reduce impacts by consolidating similar facilities and would be designed in recognition of the recommended actions for new development to further reduce effects.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal

Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: Catalina Airport

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within two miles of a public airport (Catalina), but outside of the 65 dBA CNEL developed by the airport land use plan. Estimated construction noise levels for this proposed Project site would be below the 90-dBA FTA threshold where adverse community reaction could occur during daytime hours but would exceed the 80-dBA nighttime threshold. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, this proposed Project locations is not located in a jurisdiction with a noise ordinance that is applicable to the Authority. Therefore, it is anticipated that construction of this site would not expose people to excessive noise levels. Impacts from construction of the Project would be less than significant.

After construction, the sites will be unmanned during operation except for occupational maintenance, which includes an estimated 58 dBA at 21 feet during the monthly backup generator during testing, would not be substantially different from existing levels, except for new sites in rural locations, where ambient noise levels would be closer to 45 dBA, and would generally occur less than once per week during daytime hours of between 8:00 a.m. and 6:00 p.m. on any day and 9:00 a.m. to 6:00 p.m. on Sundays, consistent with the Los Angeles County noise ordinance. Operation of the Project, including the HVAC system and emergency generator, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Catalina Island Coastal Zone

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Within Santa Catalina Island Open Space Easement

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. Site BJM is within the Santa Catalina Open Space Easement. Open space, like public land under federal management, may be used for recreation, but may have large expanses of land with no areas specifically designated for a concentrated recreational use. Enhancements to the existing communication facilities would not change the recreational opportunities or recreational experience. The communication site itself would preclude recreation and be a long-term permanent impact, but adjacent lands could continue to support compatible recreational uses. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: S Western Ave

Distance (Miles): 23.32

Disaster Route: Boat or airplane

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 7,800 feet horizontally from the Catalina Airport runway

Nearest Highway/Freeway: No highway/freeway on Santa Catalina Island

Distance (Miles): 0

Nearest Major Arterial: Shepard St

Distance (Miles): 22.89

Access to the Project Site Provided Via: Cape Canyon Trail

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site BJM is located approximately 7,800 feet horizontally from the Catalina Airport runway. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, a 180-foot-tall lattice tower), the TOWAIR tool indicates that the antenna structure is a "fail slope determination," which indicates the structure could interfere with takeoff and landing operations, and would require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. According to Federal Aviation Regulation Part 77, the height of the proposed tower will require completion of FAA Form 7460-1, Notice of Proposed Construction or Alteration, so that the obstruction can be further evaluated to determine the hazard to navigation. The allowable height is 1 foot for every 100 feet of horizontal distance (a structure of about 78 feet in this case) when the proposal is for a 180-foot-high lattice tower. The proposed construction may be allowed, but not without further coordination with FAA. If FAA approves the tower for construction, this would indicate that operation of the tower would not change air traffic patterns or result in substantial safety risks to flight operations.

Mitigation Measure(s):

HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation."

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Pebbly Beach Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: BUR

Site Name: Burnt Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest, Pine Canyon Rd. to 7N23A

City: Three Points/Lake Hughes

State: CA

Zip: 93532

Latitude: 34.6822957412

Longitude: -118.577338258

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

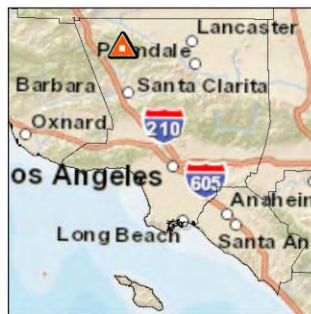
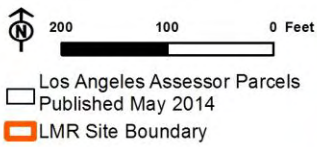
Existing Tower Type: Monopole

Existing Tower Height: 20'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5777

BUR Site Boundary Map



BUR

Burnt Peak
 Angeles National Forest - 7N23A0 Burnt Peak Spur
 Unincorporated, CA 93532

Proposed New Site Coordinates (NAD83):

Latitude: 34.682241
 Longitude: -118.577337
 Elevation (Feet): 5776

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



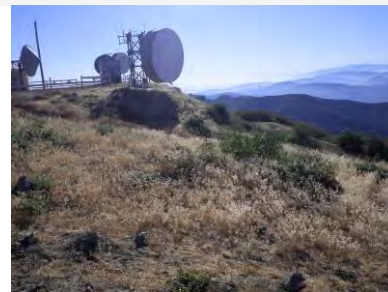
Site view looking south



Surrounding area south of site



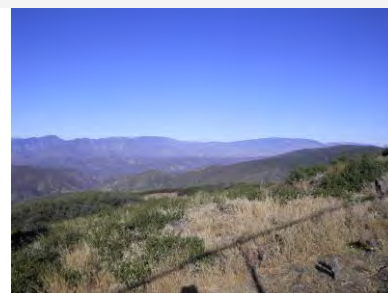
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest on a large cleared area on a high mountain top. A small, beige one-story, one-room windowless shelter and a 20-foot tall monopole currently exist, enclosed by a chain link fence. The site is remote and surrounded by densely wooded areas. This site is not visible from the closest roads due to abrupt topography, cut slopes, and vegetation. No trails, scenic corridors, or other sensitive vantage points have been identified in the vicinity of this site. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1)

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back Country (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within or adjacent to a site that includes an existing FAA navigational aid, which currently does not create a substantial visual intrusion onto the landscape. The new facilities would be readily visible due to their height, existing topography, and distance but only apparent from remote viewing locations. This site is not visible from the closest roads due to abrupt topography, cut slopes, and vegetation. No trails, scenic corridors, or other sensitive vantage points have been identified in the vicinity of this site. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. The USFS has designated the SAC for this area as B, which is considered typical. The site is also a USFS Designated Communication Site, which allows for such use on national forests. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. At the proposed height, the new antenna support structure would have impacts only locally, given the lack of viewpoints toward the site, resulting in minor change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allow for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Campsite

Distance to Sensitive Receptor: 6986

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site BUR. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site BUR or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site BUR would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site BUR will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site BUR would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site BUR or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site BUR, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site BUR, which is 6,896 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site BUR and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site BUR in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site BUR and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators

and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

Angeles National Forest

SCAG Zoning - Wildlife Preserves and Sanctuaries;

Natural Landscape Block - Liebre/Sawmill Mountains

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak chaparral [*Quercus chrysolepis* shrubland alliance]; Association - *Quercus chrysolepis* (native vegetation).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site BUR is located at the top of Burnt Peak in association with existing facilities. The site is located within a dense and extensive stand of canyon live oak chaparral vegetation community. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Several communication towers and facilities are present at and near the project site, and few if any anti-perch devices have been installed on these structures. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could

occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Liebre/Sawmill Mountains Natural Landscape Block which overlaps the ranges of approximately 242 amphibian, reptile, mammal and bird species. However, the proposed

project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources within this project location. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any resource-associated features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any uniquely definable features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Gaviota-Cieneba-Capistrano-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of gravelly loam and unweathered bedrock, and adjacent soils are well-drained sands and gravels. Soils are well to excessively well drained and have very low to very high runoff with moderately rapid permeability. The proposed building site is relatively flat, though moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site BUR and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site BUR was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site BUR. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site BUR would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO_{2e} decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO_{2e} in 2001 to 12 MTCO_{2e} in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO_{2e}. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO_{2e} to 7.98 million MTCO_{2e}, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site BUR, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site BUR would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and not on land specifically designated for recreation, such as a campground or trailhead. Burnt Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 138

Distance (Miles): 6.34

Disaster Route: State Route 138

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 6.34

Nearest Major Arterial: Highway N-2

Distance (Miles): 2.3

Access to the Project Site Provided Via: Forest Route 7N23A

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: BUR1

Site Name: Burnt Peak - 1

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Proposed construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest, Pine Canyon Rd. to 7N23A

City: Three Points/Lake Hughes

State: CA

Zip: 93532

Latitude: 34.6822499236

Longitude: -118.57469078

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

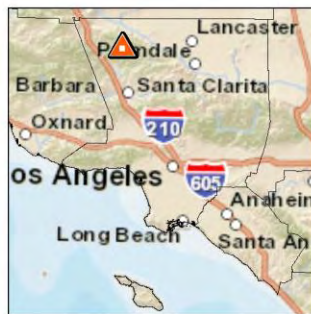
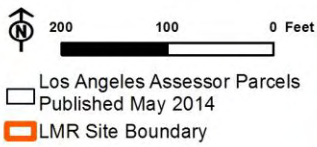
Existing Tower Type: Lattice

Existing Tower Height: approx. 50'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5639

BUR1 Site Boundary Map



BUR1

Burnt Peak-1
 Angeles National Forest - 7N23A0 Burnt Peak Spur
 Unincorporated, CA 93532

Proposed New Site Coordinates (NAD83):

Latitude: 34.68225
 Longitude: -118.574691
 Elevation (Feet): 5673

Project Site Photos

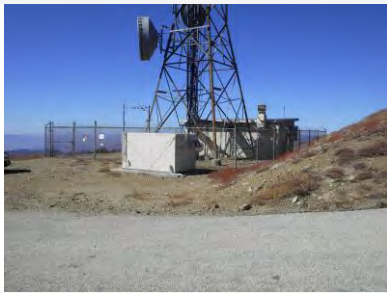
The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in Angeles National Forest in the same general area as the Burnt Peak Site, and the same conditions apply. The site consists of a small one-story windowless shelter and a lattice tower with attached microwave dishes. The site is located on dirt ground and is enclosed by a chain link fence. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1)

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back County (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within or adjacent to a site that includes an existing FAA navigational aid, which currently does not create a substantial visual intrusion onto the landscape. The new facilities would be readily visible due to their height, existing topography, and distance but only apparent from remote viewing locations. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. At the proposed height, the new antenna support structure would have impacts only locally, given the lack of viewpoints toward the site, resulting in minor change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allow for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Campsite

Distance to Sensitive Receptor: 6940

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site BUR1. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site BUR1 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site BUR1 would not exceed the SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of Nox from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site BUR1 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site BUR1 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site BUR1 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site BUR1, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site BUR1, which is 6.940 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site BUR1 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site BUR1 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site BUR1 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators

and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Natural Landscape Block - Liebre/Sawmill Mountains

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak chaparral [*Quercus chrysolepis* shrubland alliance]; Association - *Quercus chrysolepis* (native vegetation).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site BUR1 is located at the top of Burnt Peak in association with existing facilities. The site is located within the canyon live oak chaparral vegetation community. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Several communication towers and facilities are present at and near the project site, and few if any anti-perch devices have been installed on these structures. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision

hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

An biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Liebre/Sawmill Mountains Natural Landscape Block which overlaps the ranges of approximately 242 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site

usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources within this project location. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any resource-associated features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any uniquely definable features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Gaviota-Cieneba-Capistrano-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of gravelly loam and unweathered bedrock, and adjacent soils are well-drained sands and gravels. Soils are well to excessively well drained and have very low to very high runoff with moderately rapid permeability. The proposed building site is relatively flat, though moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site BUR1 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site BUR1 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site BUR1. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site BUR1 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to

2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site BUR1, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site BUR1 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and not on land specifically designated for recreation, such as a campground or trailhead. Burnt Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 138

Distance (Miles): 6.33

Disaster Route: State Route 138

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 6.33

Nearest Major Arterial: Highway N-2

Distance (Miles): 2.23

Access to the Project Site Provided Via: Forest Route 7N23A

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: BUR2

Site Name: Burnt Peak - 2

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Proposed construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest, Pine Canyon Rd. to 7N23A

City: Three Points/Lake Hughes

State: CA

Zip: 93532

Latitude: 34.6829580335

Longitude: -118.575297066

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

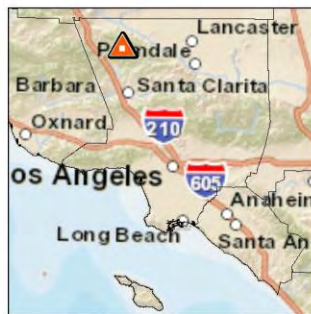
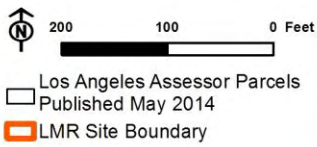
Existing Tower Type: Lattice

Existing Tower Height: approx. 30'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5733

BUR2 Site Boundary Map



BUR2

Burnt Peak-2
 Angeles National Forest - 7N23A0 Burnt Peak Spur
 Unincorporated, CA 93532

Proposed New Site Coordinates (NAD83):

Latitude: 34.682958
 Longitude: -118.575297
 Elevation (Feet): 5733

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in the same general area as the Burnt Peak site, and the same conditions apply. This site includes a small one-story windowless shelter, smaller similar structure, propane tank, and wide lattice tower with square footprint. The site is located on dirt ground and is enclosed by a high concrete wall. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1)

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back County (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within or adjacent to a site that includes an existing FAA navigational aid, which currently does not create a substantial visual intrusion onto the landscape. The new facilities would be readily visible due to their height, existing topography, and distance but only apparent from remote viewing locations. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. At the proposed height, the new antenna support structure would have impacts only locally, given the lack of viewpoints toward the site, resulting in minor change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allow for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Campsite

Distance to Sensitive Receptor: 6646

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site BUR2. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site BUR2 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site BUR2 would not exceed the SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of Nox from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site BUR2 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site BUR2 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site BUR2 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site BUR2, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site BUR2, which is 6,646 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site BUR2 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site BUR2 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site BUR2 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning Wildlife Preserves and Sanctuaries; Natural Landscape Block-Liebre/Sawmill Mountains

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak chaparral [*Quercus chrysolepis* shrubland alliance]; Association - *Quercus chrysolepis* (native vegetation).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site BUR2 is located at the top of Burnt Peak in association with existing facilities. The site is located within the canyon live oak chaparral vegetation community. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Several communication towers and facilities are present at and near the project site, and few if any anti-perch devices have been installed on these structures. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision

hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

An biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Liebre/Sawmill Mountains Natural Landscape Block which overlaps the ranges of approximately 242 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site

usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources within this project location. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any resource-associated features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any uniquely definable features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Gaviota-Cieneba-Capistrano-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of gravelly loam and unweathered bedrock, and adjacent soils are well-drained sands and gravels. Soils are well to excessively well drained and have very low to very high runoff with moderately rapid permeability. The proposed building site is relatively flat, though moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site BUR2 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site BUR2 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site BUR2. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site BUR2 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to

2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site BUR2, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site BUR2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and not on land specifically designated for recreation, such as a campground or trailhead. Burnt Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 138

Distance (Miles): 6.28

Disaster Route: State Route 138

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 6.28

Nearest Major Arterial: Highway N-2

Distance (Miles): 2.19

Access to the Project Site Provided Via: Forest Route 7N23A

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: BUR3

Site Name: Burnt Peak - 3

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest, Pine Canyon Rd. to 7N23A

City: Three Points/Lake Hughes

State: CA

Zip: 93532

Latitude: 34.6835433854

Longitude: -118.577301333

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

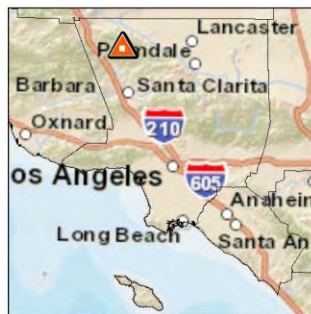
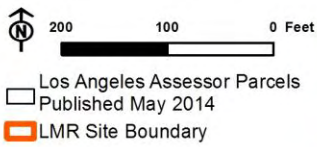
Existing Tower Type: Lattice

Existing Tower Height: approx. 20'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5765

BUR3 Site Boundary Map



BUR3

Burnt Peak-3
 Angeles National Forest - 7N23A0 Burnt Peak Spur
 Unincorporated, CA 93532

Proposed New Site Coordinates (NAD83):

Latitude: 34.683543
 Longitude: -118.577301
 Elevation (Feet): 5765

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is the same as the Burnt Peak Site, and the same conditions apply. This site includes a small lattice tower and equipment shelter. No concrete pad exists and the structures are not enclosed by fences. Thises has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back County (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within or adjacent to a site that includes an existing FAA navigational aid, which currently does not create a substantial visual intrusion onto the landscape. The new facilities would be readily visible due to their height, existing topography, and distance but only apparent from remote viewing locations. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. At the proposed height, the new antenna support structure would have impacts only locally, given the lack of viewpoints toward the site, resulting in minor change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allow for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Campsite

Distance to Sensitive Receptor: 6554

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site BUR3. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site BUR3 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site BUR3 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site BUR3 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site BUR3 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site BUR3 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site BUR3, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site BUR3, which is 6,554 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site BUR3 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site BUR3 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site BUR3 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning Wildlife Preserves and Sanctuaries; Natural Landscape Block-Liebre/Sawmill Mountains.

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak chaparral [*Quercus chrysolepis* shrubland alliance]; Association - *Quercus chrysolepis* (native vegetation).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site BUR3 is located at the top of Burnt Peak in association with existing facilities. The site is located within a dense and extensive stand of the canyon live oak chaparral vegetation community. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Several communication towers and facilities are present at and near the project site, and few if any anti-perch devices have been installed on these structures. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require

lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

An biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Liebre/Sawmill Mountains Natural Landscape Block which overlaps the ranges of approximately 242 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site

usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources within this project location. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any resource-associated features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the Project site, and the lack of any uniquely definable features at this proposed Project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Gaviota-Cieneba-Capistrano-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of gravelly loam and unweathered bedrock, and adjacent soils are well-drained sands and gravels. Soils are well to excessively well drained and have very low to very high runoff with moderately rapid permeability. The proposed building site is relatively flat, though moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site BUR3 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site BUR3 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site BUR3. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site BUR3 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to

2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site BUR3, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site BUR3 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and not on land specifically designated for recreation, such as a campground or trailhead. Burnt Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 138

Distance (Miles): 6.25

Disaster Route: State Route 138

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 6.25

Nearest Major Arterial: Highway N-2

Distance (Miles): 2.22

Access to the Project Site Provided Via: Forest Route 7N23A

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: CPK

Site Name: Castro Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 928 Latigo Canyon Rd

City: Malibu

State: CA

Zip: 90063

Latitude: 34.0856466507

Longitude: -118.785545202

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

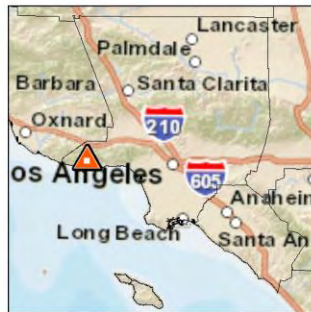
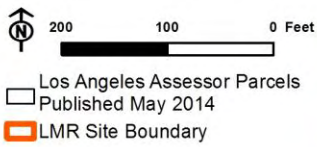
Existing Tower Type: Lattice (2)

Existing Tower Height: 125'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 2822

CPK Site Boundary Map



CPK

Castro Peak
 928 Latigo Canyon Rd.
 Unincorporated, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.085603
 Longitude: -118.785512
 Elevation (Feet): 2819

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated ridge top site is within the Santa Monica Mountains National Recreation Area located southeast of the intersection of Mulholland Highway and Kanan Dume Road on a designated significant ridgeline. The site includes a cleared area with two existing lattice towers of unknown heights (one painted red and white), utility pole with transformer, three small one-story buildings, and associated equipment (e.g., propane tank) enclosed by a chain link fence. One of the lattice towers has a triangular footprint; the other has a rectangular footprint and several attached microwave dishes. Scattered, low chaparral vegetation surrounds the site. The Castro Peak Site is immediately adjacent to the NPS Castro Crest unit within the Santa Monica Mountains NRA, which is a prominent ridgeline that forms part of the Backbone Trail corridor, with “stunning rock formations and views of the ocean and mountains” (NPS 2002). The site is visible from a trailhead on Latigo Canyon Road for the Backbone Trail. The site is accessed via minor roads within the NRA; the access road has no outlet and does not lead to a designated recreation destination.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Backbone Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a designated significant ridgeline and is within view of a trailhead for the Backbone Trail. The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The proposed new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and two towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: office trailer

Distance to Sensitive Receptor: 234

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site CPK. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site CPK or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site CPK would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site CPK will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site CPK would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site CPK or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site CPK, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site CPK, which is 234 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are lower than the SCAQMD thresholds for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site CPK and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site CPK in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site CPK and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

marcescent dudleya (*Dudleya cymosa* ssp. *Marcescens*; ESA-T; CA-R,1B.2); round-leaved filaree (California *macrophylla*; 1B.1); Santa Susana tarplant (*Deinandra minthornii*; CA-R,1B.2)

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); golden eagle (*Aquila chrysaetos*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog - dispersal (*Rana draytonii*; ESA-T; CDFW-SSC); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); round-leaved filaree (California *macrophylla*; 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area and Castro Crest (NPS); SEA/CRA- Santa Monica Mountains; CRA - Buffer 3B (Malibu Creek State Park Buffer Area); Los Angeles County Zoning - Open Space; SCAG Zoning - Wildlife Preserves and Sanctuaries, Beach Parks (Malibu Coastal Zone); Essential Connectivity Area - Castro Peak/Santa Monica Mountains - Pine Mountain/Sespe Condor Wildlife; Natural Landscape Block - Castro Peak/Santa Monica Mountains

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Scrub oak chaparral [*Quercus berberidifolius* shrubland Alliance]; Association: *Quercus berberidifolia*-*Adenostoma fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site CPK is part of an existing communications facility located on a leveled top of Castro Peak within an extensive stand of scrub oak on the north-facing slopes and chaparral on the south facing slopes. Common species include

mountain mahogany (*Cercocarpus montanus*), big-berry manzanita (*Arctostaphylos glauca*), chamise (*Adenostoma fasciculata*), and laurel sumac (*Malosma laurina*). American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting. The project area is within the foraging range of the golden eagle (*Aquila chrysaetos*; CDFW-FP); eagles may pass by the project site while foraging, but the area around the study area does not provide steep cliffs or rocky crags used for nesting. Monarch butterfly (*Danaus plexippus*; ESA-Pet) may pass through the area, but no potential roost trees occur within the project area. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur in the project area and individuals could be killed by project activities. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica National Recreation Area to occur within 1 mile of Site CPK at an unspecified location within Malibu Creek State Park. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Potentially suitable habitat may occur in the study area, with the presence of Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) controlled by the fire regime; however, all work is within existing developed site (paved, fenced, encircled by unpaved roads). Record from 2001 (2 mi to southwest) along a firebreak following a fire (where the plants were not previously recorded). Round-leaf filaree (*California macrophylla*; 1B) grows in grassy flats and depressions with clay soils in coastal sage scrub, native annual grassland, and oak woodland. Only poor quality habitat (hilltop within chaparral) exists in the project area; requires spring survey. Santa Susana tarplant (*Deinandra minthornii*; CA-R,1B.2) grows in openings in chaparral primarily on sandstone rock outcrops. Such habitat does not occur in the project area and this shrub was not observed during surveys. Marcescent dudleya (*Dudleya cymosa* ssp *marcescens*); ESA-T, CA-R, 1B.2) grows primarily on volcanic rock outcrops in canyons near streams. This plant is endemic to the Santa Monica Mountains. Suitable habitat does not occur within the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) and coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Conduct spring botanical surveys for round-leaf filaree; if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 19 Trenches and Holes Management • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Site CPK may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2015). However, this wetland type is restricted to an ephemeral drainage. Adverse impacts to this wetland may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is part of a large open space habitat block and regional wildlife linkage area. The site is part of a larger complex of communication facilities, and the proposed developments would be located entirely within, and would not expand, the existing development footprint. As such, they would be consistent with current site usage and would not alter the nature of site impacts. Therefore, there would be no substantial adverse impacts to habitat of significant value. The site is located within the CDFW's designated Castro Peak/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 277 amphibian, reptile, mammal and bird species. It is located within an Essential Connectivity Area that connects with the Las Virgenes Creek/Santa Monica Mountains, Simi Hills, Santa Susana Mountains and Pine Mountain/Sespe Condor Natural Landscape Blocks. Additionally the site is located within the proposed Santa Monica Mountains (Buffer 3[B]) Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Mitigation Recommended: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker

Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Most of Site CPK is comprised of H3 habitat, but Significant Ecological Resource Areas (SERAs) identified at the site include H2 habitat located near the eastern site boundary. The study area for Site CPK contains H1 Quiet Zone habitat. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Impacts to resources at the site are described in Impact BIO 1, Impact BIO 2, and Impact BIO 3. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2, coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There are no historical resources (archaeological) within the direct area of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. This was confirmed both through archival research and during the field survey conducted in January 2015; however, adjacent to the direct

APE, but within the near indirect APE, there is a single isolated archaeological feature (a rock ring). The rock ring (constructed of locally-sourced material and approximately 7.5 feet x 6.5 feet in size) was investigated during the field visit and there were no associated prehistoric or historic artifacts that would indicate its age or purpose. While the feature could be prehistoric, it could also be of more recent age and possibly even associated with construction, recreational, or operational use of the existing CPK communications tower complex. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required. However, in accordance with CUL MM 1, because of its unverified age and purpose, construction and operation personnel would avoid the rock feature to ensure that it is not disturbed.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the paleontologically sensitive Miocene Topanga Formation, which has produced numerous fossils of marine vertebrates throughout the County of Los Angeles. No localities are recorded within the proposed site; however, significant vertebrate fossils have been recorded from this formation in the Santa Monica Mountains region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring would be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the

absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Low to Moderate based on designation within Landslide Zone

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Moderate to High based on designation within Landslide Zone

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The Millsholm series consists of shallow, well drained soils that formed in material weathered from sandstone, mudstone and shale often with clay content up to 30%. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard

has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site CPK and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site CPK was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site CPK. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site CPK would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site CPK, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site CPK would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: Permitted 1,000 gallon diesel fuel UST on project site. Installed 1971. No documented releases associated with UST

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain:

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site: No

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC

plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open

areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Public and Semi-Public Facilities

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site CPK is along an adopted Significant Ridgeline within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Per the Local Implementation Plan adopted in 2014, new development is prohibited along Significant Ridgelines. The highest point of a structure must be located at least 50 vertical feet and 50 horizontal feet from a Significant Ridgeline. Construction of the proposed project facilities at this site (to establish a 180-foot-tall tower) would result in a significant conflict with the Santa Monica Mountains Land Use Plan. The proposed action is not in

compliance with the adopted and certified Land Use Plan because the proposed project exceeds the identified height limitations. This site has previously been developed as a communications facility and collocation on the existing structure may be allowed. A Coastal Development Permit would need to be obtained prior to construction, and adherence to the terms of the permit would be required.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles): 4.11

Disaster Route: Kanan Dume Road and Pacific Coast Highway are nearest routes

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Us Highway 101

Distance (Miles): 4.11

Nearest Major Arterial: Mulholland Hwy

Distance (Miles): 1.09

Access to the Project Site Provided Via: Castro Peak Motorway

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: DPK

Site Name: Dakin Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 200 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Avalon Canyon Rd.

City: Santa Catalina Island

State: CA

Zip: 90704

Latitude: 33.3498339181

Longitude: -118.352954571

Jurisdiction:

Landowner: Santa Catalina Island

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 200'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice

Existing Tower Height: 200'

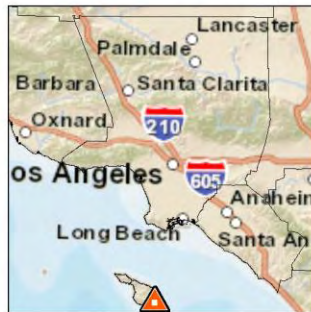
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1568

DPK Site Boundary Map



- Los Angeles Assessor Parcels Published May 2014
- LMR Site Boundary



DPK

Dakin Peak
 Avalon Canyon Rd.
 Unincorporated, CA 90704

Proposed New Site Coordinates (NAD83):

Latitude: 33.349823
 Longitude: -118.352969
 Elevation (Feet): 1559

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The Dakin Peak site is located on Catalina Island in the coastal zone approximately 2 miles inland (west) of the seaside town of Avalon, about 1,558 feet above sea level. This site includes a small one-story shelter inside a small, rectangular compound surrounded by a chain link fence. An existing 210-foot tall lattice tower and one-story shelter on a small triangular-shaped dirt area enclosed by a chain link fence is immediately adjacent to the east. Both sites are located within view of the Trans-Catalina Hiking Trail and a hiking trail/service road (Catalina Chamber n.d.). Vegetation is very low and no other development exists in the area. Primary sensitive viewers would be hikers and visitors traveling Stagecoach Road, a primary road that leads to Avalon.

Visual Sensitivity: High

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Catalina Island Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Trans-Catalina Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a hilltop within view of the Trans-Catalina Hiking Trail and a hiking trail/service road. The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located directly adjacent to a site that includes an existing 210-foot tall tower that already creates a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. A construction staging area would be created outside the chain link fence that currently surrounds the existing compound. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of an adjacent existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing structures immediately adjacent to the site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any vegetation disturbed by creation of the construction staging area would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 5600

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site DPK. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site DPK or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site DPK would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site DPK will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site DPK would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site DPK or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site DPK, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site DPK, which is 5,600 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site DPK and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site DPK in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site DPK and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Santa Catalina shrew (*Sorex ornatus willetti*; CDFW-SSC); groundfish (M&F-EFH)

Special Status Plants Recorded within 1 Mile:

aphanisma (*Aphanisma blitoides*; 1B.2); beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); chaparral ragwort (*Senecio aphanactis*; 2B.2); coast woolly-heads (*Nemacaulis denudata* var. *denudata*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); Davidson's saltscale (*Atriplex serenana* var. *dauidsonii*; 1B.2); island green dudleya (*Dudleya virens* ssp. *insularis*; 1B.2); island rush-rose (*Crocanthemum greenei*; ESA-T, 1B.2); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *Catalinense*; 1B.2); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hasse*; 1B.1); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *floribundus*; 1B.2); Santa Catalina Island manzanita (*Arctostaphylos catalinae*; 1B.2); Santa Catalina Island monkeyflower (*Mimulus traskiae*; 1A); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1); showy island snapdragon (*Gambelia speciosa*; 1B.2); south coast saltscale (*Atriplex pacifica*; 1B.2); Wallace's nightshade (*Solanum wallacei*; 1B.1)

Sensitive Communities Recorded within 1 Mile:

No

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); Townsend's big-eared bat - foraging (*Corynorhinus townsendii*; CA-CT; CDFW-SSC); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) island rush-rose (*Crocanthemum greenei*; ESA-T, CNPS-1B.2); Santa Cruz Island winged-rockcress (*Sibara filifolia*; ESA-E, 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

No

Wildlife Corridor or Nursery Site:

Santa Catalina Island Open Space Easement (Santa Catalina Island Conservancy); SEA/CRA – Santa Catalina Island; SEA - Haypress Area; SCAG Zoning - Wildlife Preserves and Sanctuaries

Local Policy or Ordinance for Biological Resources:

Santa Catalina Island Local Coastal Program

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Laurel sumac scrub [*Malosma laurina* Shrubland Alliance]; Association-*Malosma laurina*-*Eriogonum fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site DPK is located on Santa Catalina Island on a ridgeline within a transition of coastal sage scrub and chaparral vegetation community. The area has been overgrazed, resulting in areas of bare soil. Common shrubs include coast prickly pear (*Opuntia littoralis*), white sage (*Salvia apiana*), laurel sumac (*Malosma laurina*), island buckwheat (*Eriogonum crocatum*), sagebrush (*Artemisia californica*), toyon (*Heteromeles arbutifolia*), black sage (*Salvia mellifera*), and lemonade berry (*Rhus integrifolia*). Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T) may occur throughout the area. Santa Catalina shrew (*Sorex ornatus willetti*; CDFW-SSC) is restricted to riparian areas/mesic sites which are not associated with the project area. Bald eagles (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) nest on Catalina island and may occur throughout the area; project activities are not in the vicinity of potential nest sites and do not interfere with foraging habitat along the coast. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline within the project area; no project activities would impact marine environments. Aphanisma (*Aphanisma blitoides*; 1B.2) and beach spectaclepod (*Dithyrea maritima* CA- ST, 1B.1) occur primarily found in coastal sand dunes and sandy areas in coastal sage scrub; this habitat does not occur within the study area. California dissanthelium (*Dissanthelium californicum*; 1B.2) occurs in upper mesic canyons and non-weedy areas; the hilltop location does not provide habitat for this species. Catalina crossosoma (*Crossosoma californicum*; 1B.2) occur on cliffs and mesic north-facing steep slopes of canyons; this shrub was not observed during surveys, and the area does not provide habitat for the species. Chaparral ragwort (*Senecio aphanactis*; 2.2) occurs in alkaline flats of the coastal sage scrub and oak woodland; such habitat does not occur in the project area. Coast woolly (*Nemacaulis denudata*; 1B.2) occurs in coastal dunes and sandy wash benches along coastal streams, which is not present in the project area. The island rush-rose (*Crocantemum greenii*; ESA-T, 1B.2) is a small perennial that could re-sprout and be observable after spring rains following fires. Suitable habitat for this species, includes dry slopes, washes in coastal sage scrub, and desert transition chaparral; suitable habitat is present in the study area. Several occurrences were recorded within one mile between 2013 and 2014 (Goat Harbor burn area). Santa Cruz Island rockcress (*Sibara filifolia*; ESA-E, 1B.1) occurs on rocky volcanic slopes within coastal scrub. A survey in 1901 and 1973 located this plant within 3 miles of the project site; a 1997 survey did not locate plant. Potentially suitable habitat does occur in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that exceeds 200 feet in height and may require lighting presents unavoidable collision hazard for migratory birds; construction and design of the tower outside guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T) in the project area. Prior to initiation of construction activities, the site is to be inspected for the presence of fox dens; if a den is located no construction activities would be initiated and USFWS would be contacted no later than the next business day. Sites that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) would be inspected prior to moving. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Any project activities that would increase the footprint of the existing site may impact native vegetation and potentially the island rush-rose (*Crocantemum greenii*; ESA-T, CNPS-1B.2) and Santa Cruz Island rockcress (*Sibara filifolia*; ESA-E, 1B.1); preconstruction surveys would verify if present, and protect as necessary. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Lighting on new 215-foot tall lattice tower to be designed in cooperation with FAA and USFWS Office of Migratory Birds to minimize attraction and resulting mortality of migratory birds. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9

Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the Santa Catalina Island (Haypress Areas) Coastal Resource Area. This CRA provides unobstructed wildlife movement throughout its open spaces mainly in drainages and along ridgelines and dirt roads. The site is located within the Haypress Area-Hamilton Canyon SEA. The steep narrow canyons near the coast contain rare plant habitat. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Construction at the proposed Project site may conflict with policies described in California Public Resources Code Section 30240, and with specific policies contained in the Santa Catalina Island Local Coastal Plan. Construction activities on site could potentially degrade habitat values (as discussed in Impact BIO 1) in Environmentally Sensitive Habitat Areas (ESHAs), which would in turn conflict with the California Public Resources Code that precludes these ESHA impacts, and thus conflict with the Santa Catalina Island Local Coastal Plan. These conflicts would be precluded by the measures identified in Impact BIO 1. Specifically identified within the Santa Catalina Island Local Coastal Plan: • Policy 3 of the plan prohibits introduction of non-native animals to Santa Catalina Island and workers bringing pets to the site could potentially create conflict, but application of BIO MM 10, No Pets would preclude these impacts. • Policy 11 requires procedures for grading and other site procedures to minimize erosion, but BMPs to be applied at every site are designed to prevent any erosion from the site. • Proliferation of non-native weeds (considered in Policy 20) would be precluded by application of BIO MM 24, Prevent the Spread of Non-native Vegetation. Impacts associated with construction would be less than significant with mitigation. Operational activities at the site would not alter habitats, and thus would not result in any substantive conflict with existing local policies or ordinances. Impacts would be less than significant.

Mitigation Measure(s):

Incorporation of mitigation measures identified at Impact BIO-1 and application of BIO MM 10 and BIO MM 23 would preclude impacts to sensitive species, thereby avoiding or reducing construction impacts, and in turn avoiding or reducing conflicts with the Santa Catalina Island Local Coastal Plan. This would be verified by application of LU MM 1, which would require the Authority obtain a coastal development permit prior to construction at the site. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in February 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Cenozoic (Tertiary) granitic rocks, unit 2 (Catalina Island)

Stability: Moderate pending geotechnical analysis

Soil Type: Xerorthents-Thirst-Shoba-SanClemente-Rock outcrop-Eelpoint Association

Erosion Potential: Low to moderate

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site has a dominant soil type of well-drained, stony silt loam. This soil type exhibits a well-drained, medium to very rapid runoff with slow permeability resulting in moderate erosion resistance. Moderate slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site DPK and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site DPK was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site DPK. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site DPK would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO_{2e} decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO_{2e} in 2001 to 12 MTCO_{2e} in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO_{2e}. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO_{2e} to 7.98 million MTCO_{2e}, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site DPK, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site DPK would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: None identified

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Catalina Island Coastal Zone

Is the site located within a Airport Land Use Plan area?: No, but approximately 11,500 feet from Pebbly Beach and 13,300 feet from Avalon Bay seaplane bases; requires FAA notification and FCC registration

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Catalina Island Land Use Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposal for this site is to construct a new up to 180-foot-tall lattice tower on land within the Santa Catalina Island Coastal Zone. Existing communication facilities occur at the site. The Local Coastal Plan policies discourage the siting of facilities, such as communications facilities, in high-visibility locations. New development is to be attractively designed to protect highly scenic natural or historical areas. The proposed lattice tower, sited in close proximity to existing facilities, helps to reduce impacts by consolidating similar facilities and would be designed in recognition of the recommended actions for new development to further reduce effects.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Pebbly Beach Seaplane Base - L11

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within the vicinity (approximately 2 miles) of a private airstrip (Pebble Beach Seaplane Base - L11), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as DPK, this combined baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-dBA threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, the site will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Catalina Island Local Coastal Program

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Within Santa Catalina Island Open Space Easement

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. Site BJM is within the Santa Catalina Open Space Easement. Open space, like public land under federal management, may be used for recreation, but may have large expanses of land with no areas specifically designated for a concentrated recreational use. Enhancements to the existing communication facilities would not change the recreational opportunities or recreational experience. The communication site itself would preclude recreation and be a long-term permanent impact, but adjacent lands could continue to support compatible recreational uses. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: S Western Ave

Distance (Miles): 25.48

Disaster Route: Boat or airplane

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 11,500 feet from Pebbly Beach Seaplane Base and approximately 13,300 feet from Avalon Bay Seaplane Base

Nearest Highway/Freeway: No highway/freeway on Santa Catalina Island

Distance (Miles): 0

Nearest Major Arterial: Shepard St

Distance (Miles): 24.83

Access to the Project Site Provided Via: Divide Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site DPK is approximately 11,500 feet from Pebbly Beach Seaplane Base and approximately 13,300 feet from Avalon Bay Seaplane Base. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered for Site DPK, the TOWAIR tool indicates that the antenna structure (in this case, a lattice tower up to 200 feet tall) requires FCC registration and does not meet the criteria for the 6.10-meter (20-foot) rule exemption. According to Federal Aviation Regulation Part 77, the height of the proposed tower will require completion of FAA Form 7460-1, Notice of Proposed Construction or Alteration, so that the obstruction can be further evaluated to determine the hazard to navigation. The allowable height is 1 foot for every 100 feet of horizontal distance (a structure of about 115 feet in this case) when the proposal is for a 200-foot-high lattice tower. The proposed construction may be allowed, but not without further coordination with FAA. If FAA approves the tower for construction, this would indicate that operation of the tower would not change air traffic patterns or result in substantial safety risks to flight operations.

Mitigation Measure(s):

HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation."

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Pebbly Beach Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: ENC1

Site Name: Encinal 1 (Fire Camp 13)

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 1250 S. Encinal Canyon Rd

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0826352622

Longitude: -118.867006444

Jurisdiction:

Landowner: Los Angeles County, Consolidated Fire Department

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

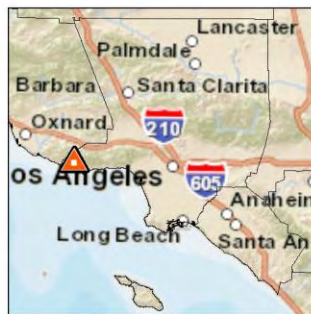
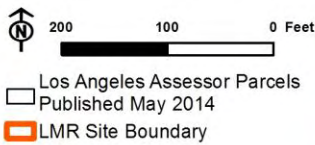
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: County Fire Camp

Existing Ground Elevation (feet AMSL): 1296

ENC1 Site Boundary Map



ENC1

Encinal 1 (Fire Camp 13)
 1250 S. Encinal Canyon Rd.
 Unincorporated, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.082606
 Longitude: -118.86703
 Elevation (Feet): 1322

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



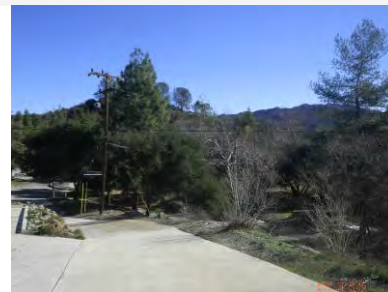
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in the Santa Monica Mountains National Recreation Area at the west end of a developed fire camp located south of and adjacent to Encinal Canyon Road, a paved 2-lane rural road that is designated as a scenic routes under the Santa Monica Mountains Coastal Program Land Use Plan. The majority of the camp is at a lower elevation than the surrounding topography and the road, from which several building rooftops can be seen intermittently behind a chain-link fence. Deciduous trees along the south side of the road partially screen views of the camp. The site is surrounded on all sides by hills. Adjacent land along the roadway corridor is primarily undeveloped and consists of rolling hills covered with chaparral vegetation. The location of the proposed lattice tower is currently obscured from, and is at a lower elevation than, the roadway. Primary sensitive viewers include NRA visitors.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Encinal Canyon Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located in a low area surrounded by hills rather than on a ridge or hill top, and therefore the proposed project would not affect a scenic vista despite the height of the tower. High earthen embankments and tall vegetation between the site and the road would also help obscure the tower from view. Views from the scenic route would not be substantially diminished. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. However, given the site's low elevation, these impacts would not affect scenic vistas.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located at the west end of a developed fire camp with concrete drives, asphalt and unpaved roads, and buildings. Minimal vegetation is present on site, and no rock outcroppings, historic buildings, or other scenic resources are present. No damage to vegetation or other elements considered scenic resources would occur during construction.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing landscape is characterized by the large fire station compound that includes several buildings, driveways, and paved parking areas. However, much of this development is hidden from view given its location below the roadway that bypasses the compound and the steep topography that surrounds it. Drivers traveling through the area would mostly view the hilly topography and tall evergreen trees. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing compound within which the structures would be located. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any vegetation disturbed during construction would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

Non required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 105

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site ENC1. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that Nox emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site ENC1 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site ENC1 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site ENC1 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site ENC1 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site ENC1 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site ENC1, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site ENC1, which is 105 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for CO and NO_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site ENC1 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site ENC1 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site ENC1 and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

monarch butterfly (*Danaus plexippus*; ESA-Pet); western pond turtle (*Emys marmorata*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*; ESA-T, 1B.1); Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2); marcescent dudleya (*Dudleya cymosa* ssp. *Marcescens*; ESA-T; CA-R,1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

golden eagle (*Aquila chrysaetos*; CDFW-FP); monarch butterfly (*Danaus plexippus*; ESA-Pet); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

Yes

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS); SEA/CRA - Santa Monica Mountains; Los Angeles County - Zuma/Trancas Canyons Open Space; SCAG Zoning - Beach Parks (Malibu Coastal Zone); Natural Landscape Block - Zuma/Trancas Canyons/Santa Monica Mountains

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association- *Adenostoma fasciculatum*-*Malosma laurina*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site ENC1 is within a large facility with concrete drives, asphalt and unpaved roads, and buildings. It is generally in a canyon setting with hills to the north and a drainage to the south. The hills and canyon slopes are covered with chamise chaparral and coast live oak woodland vegetation. An intermittent stream within the study area includes broadleaf deciduous riparian trees. Common species include purple sage (*Salvia leucophylla*), mountain mahogany (*Cercocarpus montanus*), scrub oak (*Quercus bereberidifolius*), chamise (*Adenostoma fasciculata*), redberry (*Rhamnus crocea*), coast live oak (*Quercus agrifolia*), and bush buckwheat (*Eriogonum fasciculatum*). The canyon

bottoms and drainages have a mixture of natives and ornamentals including alder (*Alnus rhombifolia*), sycamore (*Platanus racemosa*), pines, and ash. The project area is within the foraging range of the golden eagle (*Aquila chrysaetos*; CDFW-FP); eagles may pass by the project site while foraging, but the area around the study area does not provide steep cliffs or rocky crags used for nesting. Numerous sightings of monarch butterflies (*Danaus plexippus*; ESA-Pet) indicate the general vicinity may serve as a migration corridor, and large trees may be used as roost sites. The project area does not contain permanent surface water habitat for western pond turtle (*Emys marmorata*; CDFW-SSC). Project area contains potential habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1). This species is more common after fires. No plants were observed during botanic survey. Santa Monica dudleya (*Dudleya cymosa* ssp *ovatifolia*; FT, 1B) is limited to cliffs and slopes with sandstone and conglomerate rock outcrops. Suitable habitat does not occur in the study area. A record from 1980 mapped this species around Sequit Canyon as a "best guess;" no follow-up surveys are known. Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2) is a perennial species found in shady canyons and slopes adjacent to streams. This species was not observed in the area surrounding the project site during surveys conducted 8/5/2015; potentially suitable habitat may be present in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Conduct spring botanical surveys for Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2) and Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct a preconstruction survey of nearby trees for monarch butterfly roost sites. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Patches of riparian habitat consisting of alder, sycamore, coast live oak, and willow is found along drainage channels within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Zuma/Trancas Canyons/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 297 amphibian, reptile, mammal and bird species. The site is also located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site ENC1 contains H3 habitat, but Significant Ecological Resource Areas (SERAs) identified at the site include H1 habitat, H2 High Scrutiny Sub-Area habitat, and H1 Quiet Zone habitat. The study area for Site ENC1 also includes H1 habitat. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Construction and operations impacts to resources at the site are described in Impact BIO 1, Impact BIO 2, and Impact BIO 3. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2, coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5

Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: Yes

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

Yes

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no previously recorded historical resources within the direct area of potential effects (APE). There are three prehistoric archaeological sites (Resource Numbers P-19-001326, P-19-001327, P-19-001328) within the one-half mile indirect APE; however, none are identified as historical resources and all three are situated at the northwest boundary of the indirect APE, approximately 0.5 miles from the direct APE. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. During the field survey, three previously unrecorded concentrations of prehistoric artifacts were identified within the indirect APE, but at the boundary of the direct APE. Additional lithic material was also observed along the cut slope of the direct APE indicating a high probability that the prehistoric archaeological material (probably a single site) extends into the direct APE and was truncated when the area of the direct APE was graded and an access road and concrete pads were constructed. The natural features and terrain within the indirect APE and encompassing the direct APE, also indicate a high probability that other archaeological sites and features are present. Proposed LMR activities at this project location include the attachment of whip antennas and microwave dishes on a proposed 180-foot lattice tower and the construction of an equipment shelter, generator, and fuel tank. The construction of these proposed facilities would adversely affect the newly identified archaeological site(s) at this project location, which, with additional research and archaeological testing, are likely to meet the requirements of CEQA Guidelines Section 15064.5, as a historical resource (archaeological). Identified resources at this project site would be adversely affected and impacts would

be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 are would be implemented at this project site. Archaeological monitors would be present during all ground disturbing activities and construction and operational personnel would avoid the newly identified archaeological resources.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no previously recorded historical resources within the direct area of potential effects (APE). There are three prehistoric archaeological sites (Resource Numbers P-19-001326, P-19-001327, P-19-001328) within the one-half mile indirect APE; however, none are identified as historical resources and all three are situated at the northwest boundary of the indirect APE, approximately 0.5 miles from the direct APE. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. During the field survey, three previously unrecorded concentrations of prehistoric artifacts were identified within the indirect APE, but near the direct APE. Additional lithic material was also observed along the cut slope of the direct APE indicating a high probability that the prehistoric archaeological material (probably a single site) extends into the direct APE and was truncated when the area of the direct APE was graded and an access road and concrete pads were constructed. The natural features and terrain within the indirect APE and encompassing the direct APE, also indicate a high probability that other archaeological sites and features are present. Proposed LMR activities at this project location include the attachment of whip antennas and microwave dishes on a proposed 180-foot lattice tower and the construction of an equipment shelter, generator, and fuel tank. The construction of these proposed facilities would adversely affect the newly identified archaeological site(s) at this project location, which, with additional research and archaeological testing, are likely to meet the requirements of CEQA Guidelines Section 15064.5, as a historical resource (archaeological). Identified resources at this project site would be adversely affected and impacts would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present during all ground disturbing activities and construction and operational personnel would avoid the newly identified archaeological resources.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

The direct APE borders and likely encompasses a newly identified prehistoric archaeological site. The potential for human remains to be disturbed is low, but cannot be ruled out. Identified resources at this project site would be adversely affected and impacts would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present during all ground disturbing activities and construction and operational personnel would avoid the newly identified archaeological resources.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Given the archaeological resources found at this project location, Tribal resources may be present. Identified resources at this project site would be adversely affected and impacts would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present during all ground disturbing activities and construction and operational personnel would avoid the newly identified archaeological resources.

Geology and Soils

Setting

Surface Geology: Tertiary volcanic flow rocks, unit 8 (Southern California Basin)

Stability: Moderate pending geotechnical analysis

Soil Type: Rock outcrop-Lithic Xerorthents-Hambright-Gilroy Association

Erosion Potential: Low to Moderate

Expansive Soil: Low to Moderate Potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade surrounded by moderate slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site has a mix of tertiary volcanic flow rocks ranging from well-drained, very stony loam to fine-grained silt/clay material. This soil type exhibits a medium to very rapid runoff with slow permeability, resulting in moderate erosion resistance. Moderate slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located adjacent to existing fire camp near the top of a hill, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site ENC1 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site ENC1 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site ENC1. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site ENC1 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to

2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site ENC1, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site ENC1 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: History of LUSTs and releases on Project Site. Site report leak, leak stopped, case closed on LUSTs. NOVs issued. Permitted UST within 1/4 mile of Project Site (Circle R Ranch).

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or

releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open

areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Conejo-tierra Rejada Volcanic

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. While this site is situated in an area downgradient of moderate to steep slopes, it is not listed by California Geologic Survey as being within a Landslide Zone. However, due to its location downgradient of these slopes, some risk of surprise inundation by mudflow exists during construction.

Mitigation Measure(s):

GEO MM 1. Performance of a geotechnical report at the site, a condition of construction during the building permitting process would identify if there were a requirement for additional design features to prevent impacts associated with mudflow.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Public and Semi-Public Facilities

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site ENC1 is adjacent to a designated Scenic Route within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Land Use Plan Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along Scenic Routes. Land Use Plan Policy CO-152 indicates wireless telecommunication facilities along Scenic Routes should be co-located where feasible and made to blend into the landscape. The proposal is to establish a 180-foot-tall tower at a site with existing development, but not developed specifically as

a telecommunications site. Construction of the proposed project facilities at this site would result in a significant conflict with the Santa Monica Mountains Land Use Plan. The proposed action is not in compliance with the adopted and certified Land Use Plan because the proposed project exceeds the identified height limitations. To comply with the Land Use Plan, a Coastal Development Permit would need to be obtained prior to construction, and adherence to the terms of the permit would be required.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at site ENC1. However, the county ordinance has not defined impacts for groundborne noise; therefore, the potential of the project to result in exposure of persons to or generation of excessive groundborne noise levels is less than significant.

The ordinance for unincorporated Los Angeles County requires that vibration levels during construction not exceed a motion velocity of 0.01 peak particle velocity (PPV) in in/sec over the range of 1 to 100 Hertz as specified in the local ordinance. Although levels in excess of 0.01 PPV are still well below the potential damage criteria set by the FTA, 0.12 PPV for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings, the ordinance prohibits construction activities in excess of this threshold. Vibration levels from construction equipment used for this Project would range from 0.003 PPV at 25 feet for a jackhammer to 0.089 PPV for a loaded truck such as the 3-ton flatbed. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold for unincorporated Los Angeles County is 97 feet.

Sensitive receivers (scattered residential dwellings) are located within 25 feet of Project site ENC1. Vibration from loaded trucks such as the 3-ton flatbed or dump trucks could be as high as 0.018 PPV depending on the geology, soil type and stiffness; therefore, impacts from construction of the Project could expose these sensitive receiver locations to excessive groundborne vibration and impacts of the proposed Project would be significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, operational groundborne vibration or noise would be less than significant during operation of each Project site including ENC1.

At site ENC1, where construction vibration levels would exceed the unincorporated Los Angeles County vibration

ordinance threshold, NOI MM 1 would be required.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at sites ENC1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.
- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

Prior to commencement of construction at ite ENC1 the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime

threshold. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within the vicinity (approximately 2 miles) of a private airstrip (Los Angeles County Fire Department Heliport), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as ENC1, this combined baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-dBA threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, the site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Conservatively assuming a 65 dBA CNEL at proposed Project sites located 0.25 miles from private airstrips, operation of this Project site, including the HVAC systems and emergency generators, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of this Project site would not expose people residing or working in the Project area to excessive noise levels. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Mulholland Hwy

Distance (Miles): 0.51

Disaster Route: State Route 23

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: State Route 23

Distance (Miles): 0.51

Nearest Major Arterial: Encinal Canyon Rd

Distance (Miles): 0.02

Access to the Project Site Provided Via: Encinal Canyon Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: ENT

Site Name: Entrada Tank Site

Site Discussion:

Propose installation of up to 27 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 21285 W. Entrada Road

City: Topanga

State: CA

Zip: 90290

Latitude: 34.125430152

Longitude: -118.633785985

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A




Existing Tower Height: N/A

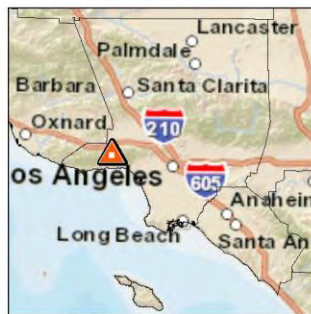
Existing Site Use: Water Tank

Existing Ground Elevation (feet AMSL): 1594

ENT Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



ENT

Entrada Tank Site
21285 W. Entrada Rd.
Calabasas, CA 90290

Proposed New Site Coordinates (NAD83):

Latitude: 34.125455
Longitude: -118.633712
Elevation (Feet): 1576

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located within Santa Monica Mountains National Recreation Area on the north side of Old Topanga Canyon Road on top of a small, mostly barren hill, and consists of two beige water tanks accessed by a paved drive. This undulating road provides views of canyons to the south and distant mountains. Some trees immediately adjacent to the site block views of it. The site is similarly obscured from view for westbound travelers by vegetation, but is intermittently visible approaching from the south. The area is semi-residential. Small houses exist intermittently near the site, and telephone poles line the road. The site is just north of, and overlooks, the intersection of Topanga Canyon Road with the Calabasas Peak Motorway, a wide fire road used as a trail to access Calabasas Peak to the southwest. The trail provides access to the Pacific Ocean, the western Santa Monica Mountains, Castro Peak, and the western San Fernando Valley (Lockeretz 2013). Hikers park along a pullout adjacent to the road directly below the site. Chaparral vegetation lines the road on the approaches to the site, but is sparse around the site itself. Cliffs along the approach from the west block views of the site until about 0.1 mile away. Sensitive viewers include trail users and NRA visitors.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Old Topanga Canyon Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site would be visible to hikers traveling east on the Calabasas Peak Motorway. The proposed new facilities would not perceptibly change the scenic vista due to the presence of the existing water tanks, which are partially obscured by tall vegetation and, given their mass, would help attenuate the noticeability of new structures. In addition, the presence of existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. The new facilities would be at a lower elevation than hikers traveling east on the Calabasas Peak Motorway, and would not block or remove views of the scenic vista. The existing trees, which are of similar height, would help shield views of the monopole from the trail. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located at a water tank facility. No scenic resources are present on the site. No damage to scenic resources would occur during construction.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are already impacted by the presence of two large water tanks. Although the monopole would introduce another man-made feature onto the landscape in the long term, it would not be significantly out of character with the surrounding trees, which are of similar height. The new monopole would also be in character with the telephone poles that currently line the nearby road, as well as the area's semi-residential setting. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any vegetation disturbed during construction would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 360

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site ENT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site ENT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site ENT would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site ENT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site ENT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site ENT or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site ENT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site ENT, which is 360 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site ENT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site ZHQ in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site ENT and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); western pond turtle (*Emys marmorata*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

California Walnut Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon - foraging (*Falco peregrinus anatum*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

NPS -Santa Monica National Recreation Area; Santa Monica Mountains Significant Ecological Area: SCAG Zoning-Local Parks and Recreation; Los Angeles County Zoning - Open Space; Natural Landscape Block - Calabasas Peak/Santa Monica Mountains;

Local Policy or Ordinance for Biological Resources:

City of Calabasas General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California sagebrush scrub [*Artemisia californica* Shrubland Alliance]; Association-*Artemisia californica*-*Salvia leucophylla*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site ENT is located on a ridgetop that has been leveled. Large non-native eucalyptus and pine trees surround the two water tanks. Steep slopes north and east of the site include coastal sage scrub and chaparral vegetation. Common species include purple sage (*Salvia leucophylla*), laurel sumac (*Malosma laurina*), sagebrush (*Artemisia californica*), scrub oak (*Quercus berberidifolius*), California lilac (*Ceanothus* sp), redberry (*Rhamnus crocea*), deerweed (*Acmispon glaber*) and ornamental pines; scattered residences are in the vicinity. American peregrine

falcon (*Falco peregrinus anatum*; CDFW-FP) may pass by the project area while foraging, but the project area does not provide steep cliff habitat required for nesting. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur in the project area and individuals could be killed by project activities. Monarch butterflies (*Danaus plexippus*; ESA-Pet) may pass through the area and use the tall trees as roost sites. No wetland habitats are present in the project area that would support two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC) or western pond turtle (*Emys marmorata*; CDFW-SSC). Primary habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) is carbonate outcrops on ridgetops; populations most prevalent after a fire. Road edges and other sources of disturbance provide potential habitat. Potentially suitable habitat may occur in the study area. Last known nearest occurrence is from 1941, non-specific mapping. Study area and the project site contains moderate quality habitat, but Braunton's milk-vetch was not observed during survey; rainfall too low to assure lack of presence. Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1) ADD SUITABLE HABITAT FROM AGH. Study area and project site contain poor quality habitat (low clay content soils) for this species. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. On 8/12/2014 an abandoned raptor nest was observed in a eucalyptus trees at the project site.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct a preconstruction survey of nearby trees for monarch butterfly roost sites. Conduct spring botanical surveys for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) and Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. California walnut groves were not observed within the project area.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Calabasas Peak/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 276 amphibian, reptile, mammal and bird species. Additionally the site is located within the proposed Santa Monica Mountains (Buffer 3[B]) Significant Ecological Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this SEA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction activities have a potential to impact biological resources at Site ENT. Proposed construction would occur within an existing communication site, and the potential for measureable losses of species diversity or habitats is low, since any ground disturbance would occur within an area already disturbed and containing low quality habitat. The site contains no wetlands or riparian areas. No oak trees occur on site. There is a potential to impact sensitive biological resources during construction, due to increased traffic, noise, motion, and dust generation. These impacts are discussed under Impact 1 in this section. During the operations phase, The proposed new antenna support structure at Site ENT would increase the probability of a bird strike hazard. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count on the access road and public roads leading to the site which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Because the Authority is exercising intergovernmental immunity, the plan is not applicable and no conflict with the City of Calabasas General Plan exists.

Mitigation Measure(s):

None required

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No; however, there is a historic road - an approximately 2 mile segment of Old Topanga Canyon Road - that crosses a portion of the indirect APE.

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). Within the indirect APE there is a historic road (Old Topanga Canyon Road), which is approximately 2 miles long and extends across the city of Calabasas between Mulholland Highway at the north and where it intersects at the south with Highway 27. The Calabasas segment of this historic road has been determined eligible for inclusion in the National Register, the California Register, and the Historical Register for the City of Calabasas. At its closest point, the historic road segment, which dates to 1865 is approximately 0.33 miles from the direct APE. Proposed LMR activities at the ENT project location include attachment of whip antennas and microwave dishes on a proposed 70-foot monopole, construction of a new equipment shelter, backup generator, and fuel tank adjacent to two large water tanks and within a stand of mature trees. Due to the intervening distance and mountainous terrain, LMR construction will be beyond line-of-sight of the LMR construction area. This was confirmed through archival research and a field survey of the project location by an SOI-qualified archaeologist and architectural historian in January 2015. Based on the distance of the identified historical resource from the project site, there would be no direct or indirect (visual) impacts from project activities on this resource at this project site. In addition, there are three unevaluated archaeological sites situated within the indirect APE; however, each of the sites is situated between 0.21 and 0.41 miles from the direct APE and would not be directly or indirectly affected by LMR project activities. Therefore there would be no impacts on these three archaeological resources from project activities.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. There are three unevaluated archaeological sites situated within the indirect APE, each of which is situated between 0.21 and 0.41 miles from the direct APE and would not be directly or indirectly affected by LMR project activities. Therefore there would be no impacts on these three archaeological resources from project activities.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Topanga Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include eagle ray, snaggle-tooth shark, basking shark, croaker, herring, rodent, camel, and baleen whale. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Low to Moderate based on designation within Landslide Zone

Soil Type: Urban land-Lithic Xerorthents-Hambright-Castaic Association

Erosion Potential: Moderate based on designation within Landslide Zone

Expansive Soil: Low to Moderate potential based on presence of silty clay loam

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site has a mix of shallow, well drained stony loam to silty clay loam. This soil type exhibits a medium to very rapid runoff with moderately slow permeability, resulting in moderate erosion resistance. Moderate slopes surround the site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local city planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell

with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site ENT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site ENT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site ENT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site ENT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO_{2e} decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO_{2e} in 2001 to 12 MTCO_{2e} in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO_{2e}. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO_{2e} to 7.98 million MTCO_{2e}, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site ENT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site ENT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Calabasas

General Plan Designation: Hillside Mountainous

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Calabasas

Los Angeles County Community or Area Plan: Santa Monica Mountains North Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Calabasas

Applicable Noise Ordinance: Municipal Code; Chapter 17.20; Section 160 Noise

Noise Level Threshold: N/A; no construction from 6 pm to 7 am on weekdays or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 215 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: Scattered Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers within this distance to the Project site; therefore, groundborne vibrational noise impacts would be less than significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts due to excessive groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, impacts due to excessive groundborne vibration or groundborne noise from Project operation would be less than significant.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 215 feet from proposed sites would be 70 dBA and not exceed the 90 dBA daytime or 80 dBA nighttime criterion; therefore, construction impacts would be less than significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working

in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 27

Distance (Miles): 1.81

Disaster Route: State Route 27

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Ventura Frwy

Distance (Miles): 1.81

Nearest Major Arterial: Mulholland Hwy

Distance (Miles): 0.62

Access to the Project Site Provided Via: Old Topanga Canyon Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route designated in a Congestion Management Program, thus increasing the

potential that vehicles accessing the sites for construction or maintenance could contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately 6-week construction period would typically add fewer than 25 vehicle trips per work day and maintenance would typically add only one or two vehicles trips per month.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: FRP

Site Name: Frost Peak (Upper Blue Ridge)

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Blue Ridge Rd. 3N06

City: Wrightwood

State: CA

Zip: 92397

Latitude: 34.3516332465

Longitude: -117.67441651

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (multiple)




Existing Tower Height: 86'; 78'; 40'; unknown

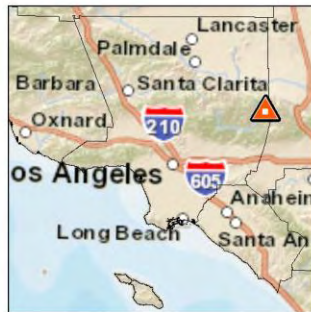
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 8510

FRP Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



FRP

Frost Peak (Upper Blue Ridge)
 Angeles National Forest - 3N06.2 E. Blue Ridge/Wright Mountain
 Unincorporated, CA 92397

Proposed New Site Coordinates (NAD83):

Latitude: 34.351633
 Longitude: -117.674417
 Elevation (Feet): 8487

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



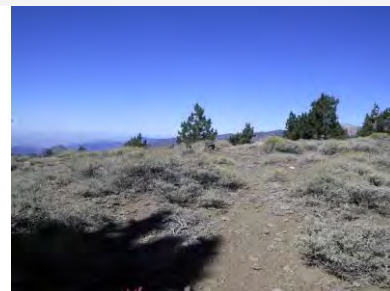
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is accessed from Blue Ridge Road, off Angeles Crest Highway, on a ridge line in Angeles National Forest. The Frost Peak (Upper Blue Ridge) site is approximately 400 feet west of, and above, the Pacific Crest Trail (PCT), one of the country's first National Scenic Trails, which spans 2,650 miles from Mexico to Canada through California, Oregon, and Washington, and traverses the ANF generally from northwest to the southeast. The Pacific Crest Trail Association (PCTA) strives to protect the trail experience, which includes "wild scenery of the highest caliber and integrity," "refuge from industrialized civilization and its sights," and "therapeutic effects of elevated 'crest' views and naturally open landscapes." The desired condition described in the PCTA 2014-2017 Strategic Plan states, "Public lands within the Foreground Trail Corridor, including lands acquired and managed for the PCT, are managed to maximize a natural appearing landscape where human development does not dominate the viewer's experience..." (PCTA 2013). The site is also southwest of the Mountain High East and West Resorts ski areas. The highest and closest ski lift is at an elevation of 8,200 feet. The site would be visible from the top of the ski lifts. The site is also about one mile southeast of the Angeles National Forest Blue Ridge Campground, which provides eight camp sites on a ridgeline between the two ski areas. The campground is closed during winter. The PCT travels right beside the camp. The site is located within a compound consisting of fourteen existing lattice towers or monopoles, and equipment shelters served by the same dirt road. Three lattice towers of varying heights are immediately adjacent. Most of the area has been previously disturbed. Vegetation is mostly low and scrubby, with a few scattered taller trees. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as A. SAC A is considered distinctive; 24% of Angeles National Forest is rated A (USFS 1995). The USFS zone for this area is Developed Area (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High/SAC A; Developed

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Pacific Crest Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would not be visible from the PCT within 0.25 mile of the site because the trail travels below the site as it contours around the hillside. Trees in the Blue Ridge Campground would obscure views of the

site, as would the distance between the two areas. The site would be visible to recreationists as they reach the top of the nearby chair lifts, and to visitors traveling East Blue Ridge Road. The new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The chair lifts approximately 0.5 mile northwest also intrude onto the scenic vista and introduce vertical elements into the landscape, and ski runs cut swaths through the trees. The new facilities would not perceptibly change the scenic vista due to the presence of these elements and the existing towers, which would attenuate the noticeability of new structure. In addition, the addition of a new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although the USFS scenic integrity objective for this area is high and the SAC rating (A) is distinctive, this area is also identified as a Developed Area zone. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, and recreation and non-recreation special-use facilities. This zone is the lowest designation for naturalness. The site is already impacted by the presence of existing facilities and towers of a similar nature. The surrounding forest has also been developed through the addition of two ski areas. The new facilities would be compatible with the existing site, and with the surrounding landscape to a lesser extent. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: Mohave Desert

Air Quality Management District: Antelope Valley

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM10 (unclassified)

State Nonattainment Status: O3, PM10, PM2.5 (unclassified)

Applicable Air Quality Management Plan(s):

AVAQMD 2004 Ozone Attainment Plan (State and Federal), AVAQMD Federal 8-Hour Ozone Attainment Plan, AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to H&S Code 39614(d), AVAQMD CEQA and Federal Conformity Guidelines

Significance Thresholds:

General Conformity (tons/year): CO (100), NOX, VOC (25); Local construction and operation (tons/year): CO (100), NOX, VOC (25), PM2.5, PM10 (15); Local construction and operation (lbs./day): CO (548), NOX, VOC (137), PM2.5, PM10 (82)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 50

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMD air quality plans considered in this analysis include the AVAQMD 2004 Ozone Attainment Plan (State and Federal) (AVAQMD 2004 Ozone Plan) (AVAQMD 2004). The purpose of this plan was to (1) demonstrate that the AVAQMD would meet the primary O3 NAAQS by the end of 2007; (2) present progress by the AVAQMD toward meeting all state planning milestones including attainment of the O3 CAAQS; and (3) discuss the 8-hour O3 NAAQS in preparation for a new nonattainment designation under a revised standard. Also considered in this analysis of Project air quality impacts is the AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area) (AVAQMD 8-Hour Ozone Plan) (AVAQMD 2008). The purpose of this plan is to (1) demonstrate that the AVAQMD will attain the primary O3 NAAQS by June 2021; (2) present progress by the AVAQMD toward meeting all required O3 planning milestones and NAAQS and CAAQS; and (3) discuss the newest 0.075 ppm O3 NAAQS in anticipation of a nonattainment designation for this revised standard.

Finally, the analysis considered the AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to Health and Safety Code 39614(d) (AVAQMD PM Measures Plan) (AVAQMD 2005). The purpose of this plan is for the AVAQMD to develop a list of Best Available Control Technologies (BACT) either currently being implemented or for future consideration to control particulate emissions within the district.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site FRP. The analysis indicates that emissions from the construction of all the proposed Project sites located in the MDAB including site FRP would not exceed AVAQMD significance thresholds for the listed criteria pollutants including O3 precursor NOx. Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for any criteria pollutants including O3 precursor NOx and particulate matter. Therefore, the Project would not conflict with or obstruct implementation of the

AVAQMD 2004 Ozone Plan, AVAQMD 8-Hour Ozone Plan, or the AVAQMD PM Measures Plan. Impacts of the proposed Project on the implementation of the AVAQMD plans would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Emissions from the construction from proposed LMR Site FRP or emissions from the simultaneous construction of the three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for criteria pollutants. Per AVAQMD guidance, compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; therefore, Project construction impacts in the MDAB would be less than significant.

Operational emissions of the proposed LMR Site FRP or the operational emissions of all Project sites in the MDAB are less than significant and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, Project operational impacts would be less than significant in the MDAB.

Mitigation Measure(s):

No mitigation measures are required.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O₃ and PM₁₀ (CAAQS) in the MDAB. Cumulatively considerable net increases in these pollutants were examined relative to the AVAQMD significance thresholds for each.

Emissions from the construction of proposed LMR Site FRP or the simultaneous construction of all three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for O₃ and PM₁₀. Per AVAQMD guidance, compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project construction emissions in the MDAB would be less than significant.

Operational emissions of the proposed LRM Site FRP or all Project sites in the MDAB would not exceed AVAQMD significance thresholds for O₃, and PM₁₀. Per AVAQMD guidance (AVAQMD, 2011), compliance with these significance thresholds is sufficient to demonstrate that operation of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project operational emissions in the MDAB would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMMD considers residences, schools, daycare centers, playgrounds and medical facilities to be sensitive receptor land uses. Exposure of sensitive receptors to substantial pollutant concentrations as defined above in Chapter 3.2.3.1, Criterion 4 is required for the following project types: (1) any industrial project within 1,000 feet; (2) a distribution center (40 or more trucks per day) within 1,000 feet; (3) a major transportation project (50,000 or more vehicles per day) within 1,000 feet; (4) a dry cleaner using perchlorethylene within 500 feet; and (5) a gasoline dispensing facility within 300 feet. While the Project as proposed does not fall within one of these project types; the analysis of sites within the MDAB includes a qualitative assessment of pollutants that impact human health.

The use of off-road heavy-duty diesel equipment by the Project for demolition, site grading and excavation, and concrete pad construction activities would result in the generation of diesel particulates (DPM) emissions. DPM were identified as a toxic air contaminant (TAC) by CARB in 1998. Other potential TAC sources associated with construction include the demolition of asbestos-containing materials and the excavation of naturally occurring asbestos (NOA) in soils. The monthly one hour test of the backup generator at each proposed Project site, including site FRP would generate DPM emissions. Emergency operation of the backup generators, which is anticipated to have a 200 hour continuous operational capacity would also generate DPM emissions. No other operational sources of these or other TACs would occur.

According to the Consolidated Table of Office of Environmental Health Hazard Assessment (OEHHA)/ CARB Approved Risk Assessment Health Values, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SCAQMD, 2015; SMAQMD, 2014); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA, 2015). As discussed in Appendix B, the maximum construction activity scenario assumed at site FRP and all proposed sites would have a six week duration. Similarly, the duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project construction and operation is not warranted.

Demolition of existing structures at proposed sites in the MDAB would be subject to AVAQMMD Rule 1403. Rule 1403 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires lead agencies and their contractors to notify the District of any regulated renovation or demolition activity. By complying with District Rule 1403, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the MDAB, including site FRP, would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per AVAQMMD guidance (AVAQMMD 2011), compliance with the criteria pollutant significance thresholds and the health risk based significance threshold established by AVAQMMD Criterion 4 is sufficient to demonstrate that construction and operation of the proposed Project sites in the MDAB, including site FRP, would not result in sensitive receptor exposure to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site FRP and all proposed Project sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to AVAQMD Rule 402. In addition, the operation of all Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to AVAQMD Rule 402; therefore, Project impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

south coast marsh vole (*Microtus californicus stephensi*; CDFW-SSC); mountain yellow-legged frog-southern California DPS (*Rana muscosa*; ESA-E, ESA-CH, CA-E)

Special Status Plants Recorded within 1 Mile:

lemon lily (*Lilium parryi*; 1B.2); San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Canyon Live Oak Ravine Forest; mountain yellow-legged frog-southern California DPS Critical Habitat (*Rana muscosa*; ESA-E, ESA-CH, CA-E)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

mountain yellow-legged frog-southern California DPS - dispersal (*Rana muscosa*; ESA-E, ESA-CH, CA-E); San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*; 1B.3)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

White fir forest [*Abies concolor* Forest Alliance]; Association- *Abies concolor*-*Pinus jeffreyi*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site FRP is located in the Angeles National Forest near the top of Frost Peak in the San Gabriel Mountains at an elevation of approximately 8,450 feet in white fir forest (*Abies concolor*) and Jeffery pine (*Pinus jeffreyi*) forest, with a shrub understory of manzanita (*Arctostaphylos* sp.), buckwheat (*Eriogonum* sp.) and sagebrush (*Artemisia* sp.). The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. The south coast marsh vole (*Microtus californicus stephensi*; CDFW-SSC) if found

in association with tidal marshes; no suitable habitat is present within the project area for the species. Mountain yellow-legged frog - southern California DPS (*Rana muscosa*; ESA-E, CA-E) designated critical habitat and frog occurrence records are known from the San Gabriel River critical habitat unit within 0.8 mile west of the site. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. The habitat for lemon lily (*Lilium parryi*; 1B.2) is wet meadows and streams, which does not occur in the project area. The project site includes habitat for San Antonio milk-vetch (*Astragalus lentiginosus* var. *antoni*; 1B.3). A survey during the summer flowering period is necessary to verify the identification. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct summer botanical surveys for San Antonio milk-vetch (*Astragalus lentiginosus* var. *antoni* 1B.3); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Canyon Live Oak Ravine Forest was not observed in the project area. Site FRP is hydrologically connected to stream habitats that include southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) critical habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within a CDFW designated Essential Connectivity Habitat Area which connects the San Gabriel/Cucamonga and Table Mountain Natural Landscape Blocks. This and other forest service sites would need to have forest service sensitive species analyzed. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Mitigation Recommended: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Within the indirect APE, there is one resource (Resource No. P-19-002465H/FS-05015400075-HIS), a historic trail system (pre and post 1926) known as the California Riding and Hiking Trail, which is eligible for inclusion in the National Register of Historic Places in 1996. The Trail crosses the indirect APE just southwest of the direct APE but outside the construction impact area. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in November 2014. LMR activities at the FRP project location include the attachment of whip and microwave antennas on a proposed 180-foot lattice tower and the construction of a new equipment shelter, backup generator, and fuel tank. The proposed 180-foot tower would be taller than the existing cluster of lattice towers; however, it would generally be in keeping with the existing communications/industrial landscape at this project location. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there

were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Schist of various types and ages, unit 2 (Southern and West-central California)

Stability: Moderate pending geotechnical analysis

Soil Type: Springdale-Rock outcrop-Etsel family Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a coarse gravelly sandy material. This soil type exhibits a well-drained, medium to very rapid runoff with moderate permeability. Moderate slopes surround the site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: Mojave Desert

Air Quality Management District: Antelope Valley

AQMD Significance Threshold: 100,000 tons CO₂eq/year (548,000 lbs. daily), 25,000 metric tons (MT) CO₂equivalent(eq)/year amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

Executive Orders S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, Senate Bill 97, AVAQMD CEQA and Federal Conformity Guidelines, Rule 3011 GHG Provisions of Federal Operating Permits

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site FRP and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the three (3) proposed Project sites in the MDAB. The generator test would last one hour at each site during a single day each month. It was also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site FRP was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all three (3) Project sites in the MDAB are estimated at 142.24 TCO₂e (129 MTCO₂e), or less than 47 TCO₂e (43 MTCO₂e) annually for proposed Project site FRP. To be consistent with the analysis of sites located in the SCAB/SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site ENT would be substantially below the AVAQMD annual 100,000 TCO₂e threshold and Council on Environmental Quality 25,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to

2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site FRP, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the AVAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site FRP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Lahontan

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar

to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are

assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Blue Ridge is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced site; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to trails or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Highway 2

Distance (Miles): 1.34

Disaster Route: State Route 2

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 1.34

Nearest Major Arterial: Highway N-4

Distance (Miles): 6.83

Access to the Project Site Provided Via: E. Blue Ridge Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: FTP

Site Name: Flint Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 3600 Linda Vista Rd

City: Glendale

State: CA

Zip: 91206

Latitude: 34.1635842853

Longitude: -118.196596351

Jurisdiction:

Landowner: RICHLAND TOWERS MANAGEMENT FLINT

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice




Existing Tower Height: unknown

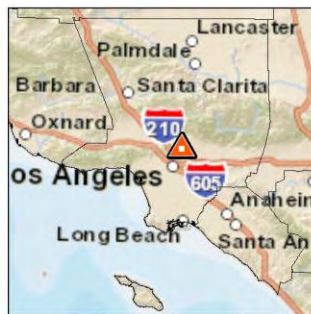
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1875

FTP Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



FTP

Flint Peak
3600 Linda Vista Rd.
Glendale, CA 91206

Proposed New Site Coordinates (NAD83):

Latitude: 34.163584
Longitude: -118.196596
Elevation (Feet): 1893

Project Site Photos

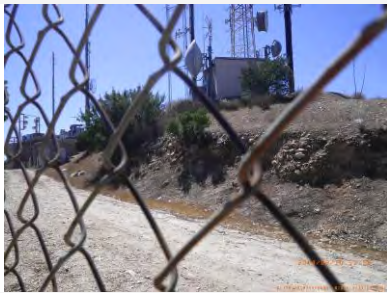
The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



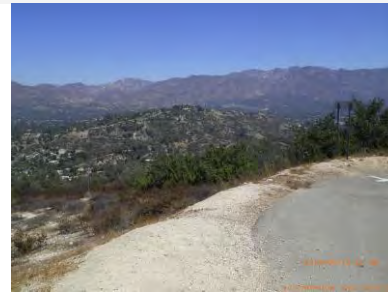
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located on a high ridge top in mostly undeveloped open space with a golf course to the south. Open space surrounds the site on all sides. Open space is vegetated with chaparral on the south and west sides of the ridge, and topography is undulating. Vegetation is noticeably denser and more evergreen on the northeast side of the ridge. Scattered subdivisions exist farther to the north and east. The site is not evident from the northeastern subdivisions. Vegetation and topography block most views of the site from the northwestern subdivision. Glen Oaks Blvd travels east-west to the south, and below, the site. The site is occasionally visible from the road. Where visible, the existing towers are a dominant feature. A tall, slender red and white lattice tower with four small antennas exists on the site. Six tall monopoles, as well two one-story equipment shelters of varying sizes, also exist. Some antennas are mounted on the buildings. The site footprint is an oblong triangular shape, surrounded on all sides by trees that abut the chain link fence that encloses the site.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not be located in an area defined as scenic vista, and are not readily visible due to steep topography and mature vegetation. Locating the new tower and equipment with existing structures would concentrate the impacts. The existing towers would attenuate the noticeability of new structures, thereby minimizing visual impacts. The new facilities would not block or remove views given the degree to which the facility is currently obscured by topography and vegetation. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no impacts to scenic vistas would occur.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site is impacted by the presence of the existing site and towers. Although the new tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Golf course

Distance to Sensitive Receptor: 860

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site FTP. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site FTP or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site FTP would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site FTP will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site FTP would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site FTP or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site FTP, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site FTP, which is 860 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 7 are higher than the SCAQMD thresholds for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site FTP and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site FTP in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site FTP and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E); southwestern willow flycatcher (*Empidonax traillii extimus*; ESA-E, CA-E)

Special Status Plants Recorded within 1 Mile:

Parish's gooseberry (*Ribes divaricatum* var. *parishii*; 1A)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon - foraging (*Falco peregrinus anatum*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Glendale General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California buckwheat scrub [*Eriogonum fasciculatum* Shrubland Alliance]; Association-*Eriogonum fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site FTP is located on a steep hilltop with chaparral vegetation. Vegetation includes bush buckwheat (*Eriogonum fasciculatum*), and sagebrush (*Artemisia californica*) dominates the south-facing slopes, and dense oak, toyon (*Heteromeles arbutifolius*), bush monkeyflower (*Diplacus aurantiacus*), lemonade berry (*Rhus integrifolia*) and mountain mahogany (*Cercocarpus montanus*) dominates the north-facing slopes. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass by the site while foraging, but the project area does not provide steep cliff habitat required for nesting. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass,

brightly colored objects) often found at developed sites. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur on-site and individuals could be killed by project activities. There is no riparian habitat suitable for least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E) or southwestern willow flycatcher (*Empidonax traillii extimus*; ESA-E, CA-E) present in the project area. A historic record (1911) from Eagle Rock of non-specific location near the site was also recorded. A recent occurrence of least Bell's vireo was recorded 1.5 miles from this site in 2013 at Devil's Gate Reservoir. A historical (1906) occurrence of the southwestern willow flycatcher was recorded from the area of Arroyo Seco. Parish's gooseberry (*Ribes divaricatum* var. *parishii*; 1A) occurs in riparian habitat. Such wetland habitat does not occur on site. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Southern Sycamore Alder Riparian Woodland is within 500 feet of the project site.

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within a CDFW's designated Essential Habitat Connectivity Area which connects the San Gabriel/Cucamonga and Table Mountain Natural Landscape Blocks. This and other forest service sites would need to have service sensitive species analyzed. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site FTP is located within the City of Glendale. Policy 1 of the Conservation Element of the City of Glendale General Plan (City of Glendale 1993) promotes the maintenance and restoration of natural resources. While native vegetation occurs in the study area of Site FTP, only disturbed vegetation and development occurs within the actual site boundary of the site. Ground disturbance at the site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected. As a result, any conflicts with the City of Glendale General Plan associated with construction activities at Site FTP would be minor and construction impacts at Site FTP would be less than significant. The proposed new antenna support structure at Site FTP increases the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on these sites, the lack of protected species known to occur near the sites, and the minimal activity associated with maintenance and repair activities, operations associated the proposed project at Site FTP would have a less than significant impact on biological resources protected by the City of Glendale General Plan. Because the Authority is exercising intergovernmental immunity, the plan is not applicable and no conflict with the City of Glendale General Plan exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in February 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Low to Moderate based on designation within Landslide Zone

Soil Type: Vista-Fallbrook-Cieneba Association

Erosion Potential: Moderate based on designation within Landslide Zone

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained, coarse sandy material. This soil type exhibits a slow to rapid runoff with moderate permeability, resulting in moderate erosion resistance. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local city planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell

with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site FTP and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days. Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site FTP was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site FTP. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site FTP would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site FTP, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site FTP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: Yes

If yes, please explain: Scholl Canyon Landfill is located between 1/8 and 1/4 mile from Project Site.

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: Yes

If yes, please explain: Scholl Canyon Landfill

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Glendale

General Plan Designation: Very Low Density Residential/Open Space

Zoning: Residential Open Space

What is the zoning height restriction, if any?:

32 feet. Additional height requires Planning Commission approval

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Glendale

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 32 feet.

Exceptions to the ordinance may be allowed with Planning Commission approval. However, per the doctrine of intergovernmental immunity, the approval requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Glendale General Plan is not applicable and no conflict with the plan exists.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Glendale

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.36 Noise Control

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays, weekends and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 134

Distance (Miles): 1.04

Disaster Route: Highway 134/Ventura Freeway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: State Route 134

Distance (Miles): 1.04

Nearest Major Arterial: E Chevy Chase Dr.

Distance (Miles): 0.54

Access to the Project Site Provided Via: extension off of E. Glen Oaks Boulevard

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Scholl Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF GLENDALE

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

•Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: GMT

Site Name: Grass Mountain

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of two (2) up to 85kW diesel generators each with up to 1,500 gallon belly tanks. Propose installation of two solar arrays up to 1500 square feet total. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 10,000 square feet

Permanent disturbance area: Up to 8,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: San Francisquito Rd. to 6N04

City: Green Valley

State: CA

Zip: 91390

Latitude: 34.6409075458

Longitude: -118.414403589

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice




Existing Tower Height: 60'

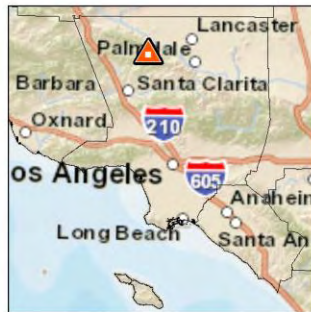
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 4603

GMT Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



GMT

Grass Mountain
 Angeles National Forest - 6N05 Grass Mountain Rd.
 Unincorporated, CA 91390

Proposed New Site Coordinates (NAD83):

Latitude: 34.640915
 Longitude: -118.414413
 Elevation (Feet): 4600

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest within a large cleared area on a high mountain top overlooking the community of Green Mountain. Low chaparral vegetation surrounds the site on all sides except the north, where tall evergreens are present. The cleared area is visible from the Green Valley community and the San Francisquito Canyon Road below the ridge near the intersection of Spunky Canyon Road. The ridge top dominates this view. A narrow lattice tower enclosed by a chain link fence exists on site. Sensitive viewers are national forest visitors. This site is in proximity to the Pacific Crest Trail. The Pacific Crest Trail traverses the ANF, described above, generally from northwest to the southeast. Thousands of hikers and equestrians use this trail each year. The Pacific Crest Trail Association (PCTA) strives to protect the trail experience, which includes “wild scenery of the highest caliber and integrity,” “refuge from industrialized civilization and its sights,” and “therapeutic effects of elevated ‘crest’ views and naturally open landscapes.” The desired condition described in the PCTA 2014-2017 Strategic Plan states, “Public lands within the Foreground Trail Corridor, including lands acquired and managed for the PCT, are managed to maximize a natural appearing landscape where human development does not dominate the viewer’s experience...” (PCTA 2013). The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, . The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High/SAC B; Back Country

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Pacific Crest Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a cleared high hilltop that would be in view of the surrounding ANF and the PCT. The proposed new features would be uncharacteristic of the scenic vista if no structure was already present. However, the new facilities would be located within a site that includes an existing lattice tower that already creates a visual

intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. The site would be visible on from other locations within the forest given the ridge line's prominent height. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The level of human use and infrastructure in a USFS back country zone is typically low to moderate. Although this zone allows a range of compatible uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development. The existing visual character and quality of the site and its surroundings are impacted by the presence of the existing lattice tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site, resulting in no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 5724

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site GMT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site GMT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site GMT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site GMT would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site GMT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites

can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measures AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site GMT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site GMT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site GMT or the simultaneous operation of all proposed Project sites in the

SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?**Construction Impact:** Less than Significant Impact**Operational Impact:** Less than Significant Impact**Discussion:**

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site GMT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site GMT, which is 5,742 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 37 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site GMT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for

Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site GMT in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site GMT and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

round-leaved filaree (California macrophylla; 1B.1); San Fernando Valley spineflower (Chorizanthe parryi var. fernandina; ESA-C, CA-E, USFS-S, 1B.1)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

bald eagles (Haliaeetus leucocephalus; CA-E, CDFW-FP, USFS-S); California condor (Gymnogyps californianus; ESA-E, CA-E, CDFW-FP); round-leaved filaree (California macrophylla; 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Natural Landscape Block- San Francisquito

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak woodland [Quercus chrysolepis Shrubland Alliance];

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site GMT is located in the Angeles National Forest on Grass Mountain, a hill top clearing with non-native grassland and scattered canyon live oak and Coulter pines; down slope are dense stands of chaparral vegetation. Vegetation on the north-facing slope includes Coulter pine, blue elderberry (Sambucus nigra), squawbush (Rhus trilobata), and non-native grassland on the south-facing slopes. A bald eagle (Haliaeetus leucocephalus; CA-E, CDFW-FP, USFS-S) has been observed during the winter in 2009. They may pass through the area while utilizing habitat at Lake Elizabeth, almost 2 miles from the project site; project activities do not interfere with foraging habitat at Lake Elizabeth. The study area is within the foraging range of the California condor (Gymnogyps californianus; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to

human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Several communication towers and facilities are present at and near the project site, and few if any anti-perch devices have been installed on these structures. Habitat for round-leaved filaree (*California macrophylla*; 1B.1) includes clay flats and depressions in native grasslands. Very poor habitat for this species occurs within the survey area though surveys are needed during the appropriate season. Habitat for San Fernando Valley spineflower (*Chorizanthe parryi* var. *Fernandina*; FC, SE, 1B.1) includes mature wash benches along major washes; habitat for this species does not exist in the project area. A historic record (1929) exists within 1 mile of the project site. This plant has not been relocated since 1929, though no thorough surveys have been completed. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

An biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Conduct spring botanical surveys for round-leaved filaree (*California macrophylla*; 1B.1); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Francisquito Natural Landscape Block which overlaps the ranges of approximately 237 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 180-foot lattice tower and the construction of a new equipment shelter, backup generator, and fuel tank within an area where there is existing communications equipment, including a lattice tower. The proposed 180-foot tower would be taller than the existing lattice tower; however, it would generally be in keeping with the existing communications/industrial landscape at this project location. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant,

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land,

consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate to High pending geotechnical analysis

Soil Type: Gaviota-Cieneba-Capistrano-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained, gravelly loam material with moderate permeability. Erosion resistance is considered moderate at the site. The proposed building site is flat with moderate to steep slopes surrounding the site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site GMT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Additional detail on the methodology for the construction and operational impact analysis is provided in Appendix B-1.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site GMT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site GMT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site GMT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site GMT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site GMT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Backcountry

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry. Backcountry includes areas of the national forest that are generally undeveloped with few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar

to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are

assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. However, Grass Mountain is not identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 138

Distance (Miles): 9.25

Disaster Route: San Francisquito Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Antelope Valley Frwy

Distance (Miles): 9.25

Nearest Major Arterial: Elizabeth Lake Rd

Distance (Miles): 1.96

Access to the Project Site Provided Via: Grass Mountain Fire Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Antelope Valley Recycling and Disposal Facility

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: GRM

Site Name: Green Mountain

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of utility pole and overhead power line. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Temescal Canyon Fire Rd

City: Los Angeles

State: CA

Zip: 90272

Latitude: 34.0863855473

Longitude: -118.548939244

Jurisdiction:

Landowner: State of California

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

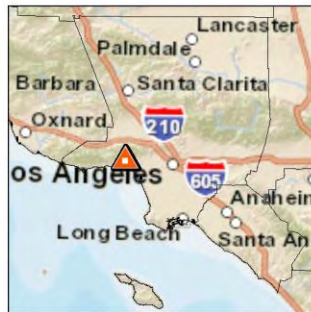
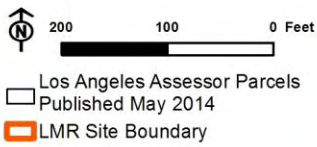
Existing Tower Type: Lattice

Existing Tower Height: 50'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1946

GRM Site Boundary Map



GRM

Green Mountain
 Temescal Canyon Fire Rd.
 Los Angeles, CA 90272

Proposed New Site Coordinates (NAD83):

Latitude: 34.086363
 Longitude: -118.548791
 Elevation (Feet): 1916

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This small site is located within the Coastal Zone in Topanga State Park along Temescal Ridge Trail Road, in the Santa Monica Mountains just inside the coastal zone. The site includes a small one-story building enclosed by chain link fence, utility poles, and tall, slender lattice tower of unknown height. The Temescal Ridge Trail begins in the subdivision south of the site and leads directly to and past it. The site's location is identified on local trail maps as Green Peak, a 1,966-foot summit on Temescal Ridge Trail. Following the trail farther leads to Temescal Peak (hikespeak.com 2014). The Temescal Lookout is approximately 0.5 mile north at roughly the same elevation, and is identified in the park's general management plan as a vantage point (CA State Parks 2011). Primary sensitive viewers include hikers on the "heavily traveled" Temescal Ridge Trail, which "begins with a 1,000-foot ascent that gives way to panoramic ocean-and-city views, then descends into a sycamore-shaded canyon to a seasonal waterfall" (trails.com 2014).

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Brentwood/Pacific Palisades Community Plan

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: Topanga State Park

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 2680

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site GRM. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site GRM or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site GRM would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site GRM will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site GRM would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site GRM or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site GRM, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site GRM, which is 817 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher for CO and No_x, lower for PM₁₀ and PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site GRM and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site GRM in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site GRM and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

monarch butterfly (*Danaus plexippus*; ESA-Pet); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); white-veined monardella (*Monardella hypoleuca* ssp *hypoleuca*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland; Braunton's milk-vetch Critical Habitat (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); white-veined monardella (*Monardella hypoleuca* ssp *hypoleuca*; 1B.3)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS); Topanga State Park (California Department of Parks and Recreation); SEA - Santa Monica Mountains (Temescal-Rustic-Sullivan Canyons); CRA - Santa Monica Mountains; SCAG Zoning - Open Space and Recreation; Natural Landscape Block - Topanga Canyon/Santa Monica Mountains

Local Policy or Ordinance for Biological Resources:

Topanga State Park General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California buckwheat scrub [*Eriogonum fasciculatum* Shrubland Alliance]; Alliance - *Eriogonum fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site GRM is located on a hill top with several unpaved roadways leading up the slope and circling the existing facilities at the project site. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica Mountains National Recreation Area to occur within 1 mile of Site GRM at an unspecified location within Topanga State Park. Though the project site is located in mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been

reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Primary habitat for Braunton's milk-vetch (*Astragalus brauntonii*; FE, 1B.1) is carbonate outcrops on ridgetops; populations most prevalent after a fire. Road edges and other sources of disturbance such as fire provide potential habitat for Braunton's milk-vetch; suitable habitat may be present within the project area, though the species was not observed during the fall habitat assessment survey. About 1 to 1.5 miles of the access road passes through designated critical habitat. Habitat for white-veined monardella (*Monardella hypoleuca* ssp. *Hypoleuca*; CNPS 1B.3) occurs within the project area although this shrubby species was not observed during the fall habitat assessment survey. Monarch butterflies (*Danaus plexippus*; ESA-Pet) have been observed in the area. Butterflies tend to "hilltop" and seek high points on the landscape and so may spend more time near the project site during migration. Roost trees were not observed in the project area. The site does not contain stream or aquatic habitat for two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC). Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Conduct spring botanical surveys for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) and white-veined monardella (*Monardella hypoleuca* ssp. *Hypoleuca*; 1B.3); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The Southern Sycamore Alder Riparian Woodland is within 500 feet of the project site. Site GRM may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat. Site GRM is 800 feet from designated critical habitat for Braunton's milkvetch (*Astragalus brauntonii*; FE, 1B.1); the access road passes through about 1 mile of critical habitat.

Mitigation Measure(s):

Limit impacts to native vegetation at Project site and along access road. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM

24 Special Status Plants Surveys and Instructions

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Topanga Canyon/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 275 amphibian, reptile, mammal and bird species. Additionally the site is located across both the proposed Santa Monica Mountains (Temescal-Rustic-Sullivan Canyons) Significant Ecological Area and the Santa Monica Mountains Coastal Resource Area, which are identified as important regional habitat linkage in the Los Angeles General Plan. Linkages in this SEA and CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement which primarily takes place on the local ridgelines and canyons..

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project may conflict with goals and guidelines described in the Topanga State Park General Plan that protect sensitive plant and wildlife species and reduce exotic plant species. Proposed development would be consistent with current site usage; there would be no change in the nature of the on-site impacts. Conflicts could occur as sensitive species protected by the Topanga State Park General Plan could be impacted (see discussion under Impact BIO-1, BIO-2, and BIO-3). These conflicts would result in significant impacts.

Mitigation Measure(s):

Incorporation of mitigation measures identified at Impact BIO-1 and Impact BIO-2 would preclude impacts to sensitive species and habitats, thereby avoiding conflict or reducing conflict with the Topanga State Park General Plan to a less than significant level. Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Santa Susana, which has a moderate potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, this formation has produced fossil specimens of eagle ray, primitive shark, dogfish shark, bonito shark, lemon shark, and the holotype of the chimaeroid *Ischyodus zinsmeisteri* in the Santa Monica Mountains region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Santa Susana Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Paleocene marine rocks, unit 1 (Central and Southern California)

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low to Moderate Potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The Millsholm series consists of shallow, well drained soils that formed in material weathered from sandstone, mudstone and shale often with clay content up to 30%. Moderate to steep slopes surround the proposed flat building site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell

with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site GRM and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site GRM was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site GRM. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site GRM would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site GRM, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site GRM would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: Yes

If yes, which department?: California Department of Parks and Recreation

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: City of Los Angeles, Pacific Palisades Subarea

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Los Angeles

General Plan Designation: Open Space

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Los Angeles

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: Brentwood - Pacific Palisades

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified. No conflict with the Topanga State Park General Plan was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Los Angeles

Applicable Noise Ordinance: Municipal Code, Chapter IV Public Welfare

Noise Level Threshold: N/A; no construction from 9 pm to 7 am on weekdays, weekends and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: City of Los Angeles, Pacific Palisades Subarea

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: Yes

If yes, Plan or Designation Area: Topanga State Park

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Topanga State Park

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 27

Distance (Miles): 2.4

Disaster Route: Pacific Coast Highway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Interstate 405

Distance (Miles): 2.4

Nearest Major Arterial: Sunset Blvd

Distance (Miles): 2.31

Access to the Project Site Provided Via: Temescal Ridge Trail

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF LOS ANGELES

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: H-17A

Site Name: H-17A

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Intersection of Ridge Fire Rd and Tank Fire E Rd

City: Whittier

State: CA

Zip: 90601

Latitude: 33.9981495656

Longitude: -118.036495183

Jurisdiction:

Landowner: City of Whittier

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

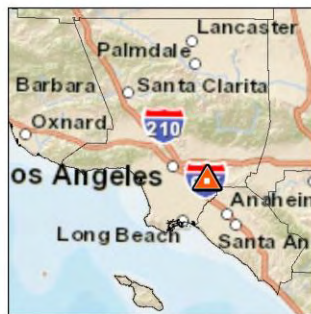
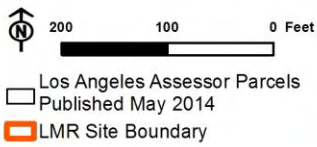
Existing Tower Type: Lattice (2)

Existing Tower Height: 80' each

Existing Site Use: Water Tank, helipad

Existing Ground Elevation (feet AMSL): 986

H-17A Site Boundary Map



H-17A

H-17A

Ridge Fire Rd. and Tank Fire E. Rd.
Whittier, CA 90601

Proposed New Site Coordinates (NAD83):

Latitude: 33.998318

Longitude: -118.036351

Elevation (Feet): 981

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

Site H-17A is located on a ridge top along Rattlesnake Ridge Trail in Hellman Park in a low density suburban area. The site includes a large, white water tower and two lattice towers of varying unknown heights. Microwave dishes are attached to one tower. The site is on a semi-circular concrete pad enclosed by a chain link fence. Two medium sized trees are located at the site's outer boundary; otherwise, vegetation is limited to grasses and low shrubs. Topography slopes away from the ridge to the north and south. The site would be visible from Rattlesnake Ridge Trail and Hellman Park Trail to the southeast, as well as from Sycamore Canyon Open Space to the north. Sycamore Canyon provides "exceptional hiking into beautiful riparian habitat." Many large, old California sycamores and coast live oaks, as well as arroyo and black willows, line the canyon (SMMC 2014).

Visual Sensitivity: Medium

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: Hellman Park; adjacent to Sycamore Canyon Open Space

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not be located in an area defined as a scenic vista. The addition of proposed equipment with existing structures would concentrate the impacts. The existing towers would attenuate the noticeability of new structures, thereby minimizing visual impacts. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no impacts to scenic vistas would occur.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Operational impacts would result from installation of the new tower and equipment, which would be uncharacteristic of the visual character if no structures were already present. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change or noticeably or unfavorably contrast with the existing visual character or quality due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, co-locating the new tower and equipment with existing structures would concentrate the impacts so that a small area is altered, thereby minimizing impacts to visual character and quality. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to visual character or quality would occur. Construction impacts would be related to construction of the new tower and equipment. Construction would occur over an approximate 6-week period and involve a variety of equipment, including 4-wheel drive trucks making daily trips to and from the site. Transportation to and from the site would create dust that would temporarily affect the visual character of the area. These construction activities would result in minor temporary visual impacts that would occur on weekdays when visitation to the Rattlesnake Ridge Trail, Hellman Park Trail, and Sycamore Canyon Open Space would be low. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required..

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 925

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site H-17A. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site H-17A or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site H-17A would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site H-17A will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site H-17A would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site H-17A or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site H-17A, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site H-17A, which is 925 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 11 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site H-17A and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site H-17A in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site H-17A and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

bank swallow (*Riparia riparia*; CA-T); burrowing owl (*Athene cunicularia*; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC); least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E)

Special Status Plants Recorded within 1 Mile:

intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2); many-stemmed dudleya (*Dudleya multicaulis*; CA-1B.2)

Sensitive Communities Recorded within 1 Mile:

coastal California gnatcatcher Critical Habitat (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; CNPS 1B.2); burrowing owl (*Athene cunicularia*; CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

coastal California gnatcatcher

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Puente Hills Significant Ecological Area (Sycamore & Turnbull Canyons); SCAG Zoning - Local Parks and Recreation;

Local Policy or Ordinance for Biological Resources:

City of Whittier General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Laurel sumac scrub [*Malosma laurina* Shrubland Alliance]; Association-*Malosma laurina*-*Artemisia californica* and non-native herbaceous stand (scrub).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site H-17A is located on a hilltop in the Puente Hills at a former Nike Missile site. The southwestern portion of the project area contains coastal sage scrub vegetation; the eastern portion contains non-native grassland, with scattered elderberry (*Sambucus mexicana*) and walnut (*Juglans californica*) in the draws and north-facing slopes. The site does not contain riparian streambank nesting habitat for bank swallow (*Riparia riparia*; CA-T). An observation was made in 1894 from stream bank in "Whittier." The burrowing owl (*Athene cunicularia*; CDFW-SSC) is often found in highly disturbed areas. A 2010 observation has been recorded in the CNDDDB along Skyline/Fire

Ridge Road about 0.2 mile west of the project site, within the fire breaks along the ridgeline. Similar and contiguous habitat is found within the study area. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur on-site and individuals could be killed by project activities. The study area and surrounding lands are within designated critical habitat for the coastal California gnatcatcher (*Poliioptila californica californica*; ESA-T, CDFW-SSC). The project site is mapped to include patches of coastal sage scrub vegetation, including California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), prickly-pear cactus (*Opuntia littoralis*), and lemonade bush (*Rhus integrifolia*). These and other habitat components constitute primary constituent elements of critical habitat for this species. The access road to the project site traverses a slope that supports moderate to high quality gnatcatcher habitat. Extensive coastal sage scrub habitat is found on surrounding hillsides. Protocol surveys for the gnatcatcher were conducted in 2014 where the access road traverses high quality habitat and no birds were detected. Construction activities could result in the loss of approximately 2.6 acres of designated gnatcatcher critical habitat, reducing nesting and foraging habitat availability at the project site. The amount of vegetation that may be removed could constitute the area utilized by a breeding pair (breeding ranges are estimated between 2 and 14 acres). If vegetation removal would occur during the breeding season, there is a possibility that a gnatcatcher nest could be lost. Habitat loss can increase fragmentation of patches already separated by roads, and possibly increase exposure to predation. Temporary disturbance due to construction activities (e.g., construction vehicle access, concrete cutting, trenching, and other sources of loud noises and activities) during the breeding season could disrupt birds nesting near the site or along the access road. The CDFG has established a 500-foot protection zone around active nests of special status species of birds. Temporary disturbance outside of the breeding season, including continued operations at the site, may briefly disrupt dispersal or foraging activities of the non-migratory gnatcatcher, though it may be expected that the reaction of the birds would be within their normal behavior patterns. The least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E) is restricted to stands of dense riparian or riparian scrub vegetation. The site does not contain aquatic/riparian habitat suitable of least Bell's vireo or western spadefoot (*Spea hammondi*; CDFW-SSC). Numerous vireo occurrences have been recorded within about 2 miles where there is dense, mature riparian habitat. At the bottom of Sycamore Canyon and Dark Canyon, intermittent streams, more than 1,000 feet north of the project site, there appears to be patches of possibly suitable habitat. South of the project site intermittent drainages appear too steep and provide limited riparian vegetation, if any, to support vireos. No project activities would impact these areas. The undisturbed vegetation contains potential habitat for intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; CNPS 1B.2), which grows in grasslands and openings in chaparral and coastal sage scrub. No distinctive mariposa lily fruiting stalks were observed during the fall survey. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard and coastal California gnatcatchers (*Poliioptila californica californica*; ESA-T, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; especially coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]). Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. No construction activities during the gnatcatcher breeding season. Stay on existing roads. Manage trenches so as not to trap wildlife. Conduct protocol surveys for the gnatcatcher; if nesting is present within the project area limit construction activities to the non-breeding season. Conduct spring botanical surveys for intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Mitigation required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13

Coastal California Gnatcatcher Breeding Season Restrictions • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The study area and surrounding lands are within designated critical habitat for the coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, CDFW-SCC). The project site is mapped to include patches of coastal sage scrub vegetation, including California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), prickly-pear cactus (*Opuntia littoralis*), and lemonade bush (*Rhus integrifolia*). These and other habitat components constitute primary constituent elements of critical habitat for this species. Construction activities could result in the loss of components of designated gnatcatcher critical habitat, reducing nesting and foraging habitat availability at the project site. Habitat loss can increase fragmentation of patches already separated by roads, and possibly increase exposure to predation. There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

Protect native vegetation. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection of Habitat • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the Puente Hills (Sycamore & Turnbull Canyons) Significant Ecological Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. This SEA has been found to support significant wildlife movement as well as residential habitat, and serves as a linkage between the Puente Hills and Chino Hills. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities could remove vegetation and therefore could result in conflict with the City of Whittier General Plan. Site H-17A includes an existing tower facility and road, but also includes disturbed native scrub vegetation. The use of the site is a communications facility and most of the buildable (flat) portion of the site is developed. Ground disturbance associated with proposed construction at the site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected. As a result, any construction impacts to biological resources protected by the City of Whittier General Plan at Site H-17A would be minor. The proposed new structure increases the probability of a bird strike hazard, even if other towers are present. Temporary disturbance of vegetation increases the chances of permanently spreading nonnative weed species into unaffected areas. Maintenance of the sites is expected to occur approximately once a month, this increase in road use could result in mortality for some wildlife. These impacts may occur to a few individual animals, however, without impacts at a landscape level. In addition, the Project site development would be within, or involve a slight expansion of, existing facilities, and so would not change the character or magnitude of existing impacts. Due to the potential for protected species in nearby areas, operations of the proposed project could have a significant impact on biological resources protected by the City of Whittier General Plan (as well as other applicable protections which are in force and discussed under Impact 1). However, because the Authority is exercising intergovernmental immunity, the plan is not applicable and no conflict with the City of Whittier General Plan exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Sycamore Canyon Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, this formation has produced numerous fossil specimens in the San Gabriel Valley region, including a fossil whale skeleton. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Sycamore Canyon Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Low to Moderate based on designation within Landslide Zone and proximity to Fault Line

Soil Type: Soper-Fontana-Calleguas-Balcom-Anaheim Association

Erosion Potential: Moderate based on designation within Landslide Zone

Expansive Soil: Low to Moderate Potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line (Whittier Fault) was identified approximately 1/3 mile southeast of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and

Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, gravelly sandy clay loam that has a rapid runoff characteristics with moderately slow permeability. This condition increases erosion hazards in areas of sloping terrain; however, the proposed building site is on relatively flat grade. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site H-17A and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site H-17A was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site H-17A. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site H-17A would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site H-17A, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site H-17A would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Presbyterian Intercommunity Hospital

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain:

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Yes, Located within a designated 'Very High' Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Whittier

General Plan Designation: Park

Zoning: Hillside Residential

What is the zoning height restriction, if any?:

Maximum building height (30 feet), or 70 feet with conditional use permit

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Whittier

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 70 feet.

Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Whittier General Plan is not applicable and no conflict with the plan exists.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Whittier

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.32 Noise Control

Noise Level Threshold: N/A, permitted construction during daytime hours

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Presbyterian Intercommunity Hospital

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the vicinity (approximately 1.5 miles) of a private airstrip (Presbyterian Intercommunity Hospital), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as H-17A, this combined baseline noise level in combination with the estimated construction noise level for this site would be below the 90-Db threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Hellman Park

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 72

Distance (Miles): 1.4

Disaster Route: Workman Mills Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Interstate 605

Distance (Miles): 1.4

Nearest Major Arterial: Beverly Blvd

Distance (Miles): 0.65

Access to the Project Site Provided Via: Tank Fire E. Road or Ridge Fire Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: No

Site Served by or has Available Access to Domestic Water System: CITY OF WHITTIER

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: H-69B

Site Name: H-69B

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Unnamed road – nearest intersection West Saddle Peak Rd

City: Topanga

State: CA

Zip: 91301

Latitude: 34.074563231

Longitude: -118.628216123

Jurisdiction:

Landowner: KUMOFF LLC

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

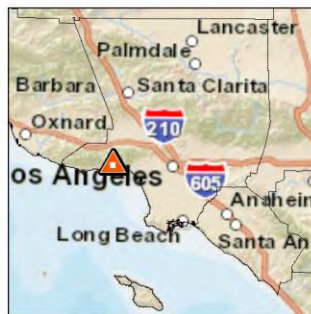
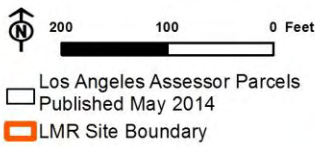
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: Helipad

Existing Ground Elevation (feet AMSL): 2456

H-69B Site Boundary Map



H-69B

H-69B

Saddle Peak Rd. and Swenson Dr.
Unincorporated, CA 90290

Proposed New Site Coordinates (NAD83):

Latitude: 34.074499

Longitude: -118.624494

Elevation (Feet): 2406

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in the Santa Monica Mountains National Recreation Area west of the intersection of Saddle Peak Road and Swenson Drive on at the intersection of two ridgelines. Los Angeles County designates one of these ridgelines as “significant” and the other as “proposed significant.” H-69B is also adjacent to a scenic route (Saddle Peak Road) as designed under the Santa Monica Mountains Coastal Program Land Use Plan. The access road to the site also provides access to two estate houses, although the site itself is not visible. The existing site consists of a large barren area occupying approximately 12,500 square feet, with no existing structures.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Saddle Peak Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Significant and Unavoidable Impact

Discussion:

The proposed new facilities would be located in an area with no existing structures. The new facilities would intrude upon views of the Pacific Ocean from vantage points to the north, including the significant ridgeline upon which the site would be located. Ongoing and recurring maintenance activities would be barely visible and infrequent. Because no structures currently exist on the site, and because the site is located on a designated significant ridgeline and is adjacent to a scenic route within a national recreation area, a substantial adverse effect to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

Unavoidable impact. A measure evaluated to address the significant visual impacts included painting the new structures to blend with their visual setting. This measure was determined infeasible because FAA guidelines specify paint colors to be used on structures for aviation safety purposes and painting the new structures to blend with surroundings would not reduce their visual impact to less than significant levels.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Very little vegetation exists on the site, and no rock outcroppings, historic buildings, or other scenic resources are present. No damage to vegetation or other elements considered scenic resources would occur during construction

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Significant and Unavoidable Impact

Discussion:

The existing visual character and quality of the site is low due to the size of the barren, disturbed area. However, the height of the new tower would contrast and be incompatible with the visual character of the surrounding landscape, which consists primarily of vegetated forests. Although some development, such as estate houses, exists, development is fairly sparse. The result would be a degradation of the visual character surrounding the site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

Unavoidable impact. A measure evaluated to address the significant visual impacts included painting the new structures to blend with their visual setting. This measure was determined infeasible because FAA guidelines specify paint colors to be used on structures for aviation safety purposes, and painting the new structures to blend with surroundings would not reduce their visual impact to less than significant levels.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 171

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site H-69B. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site H-69B or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site H-69B would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site H-69B will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site H-69B would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site H-69B or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site H-69B, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site H-69B, which is 171 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for CO, Nox, lower for PM₁₀, PM 2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site H-69B and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site H-69B in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site H-69B and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFG-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); two-striped garter snake (*Thamnophis hammondi*; CDGF-SSC); western pond turtle (*Emys marmorata*; CDFG-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon - foraging (*Falco peregrinus anatum*; CDFG-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS); SEA/CRA - Santa Monica Mountains; SCAG Zoning - Wildlife Preserves and Sanctuaries (Malibu Coastal Zone)

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Big pod ceanothus chaparral [*Ceanothus megacarpus* Shrubland Alliance]; Association-Ceanothus megacarpus-*Adenostoma fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site H-69B is located adjacent to a paved road on a hilltop in the San Gabriel Mountains. The site is used as a helicopter landing pad and has been largely leveled and cleared of vegetation, with patches of chaparral on steep slopes. Dense chaparral shrubs are on steep north-facing slopes within the project area. Vegetation includes chamise, big-berry manzanita, laurel sumac, bush buckwheat, purple sage, and chaparral currant. A private

residence and vineyard is within the project area, and other residences are scattered throughout the vicinity. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass by the site while foraging, but the project area does not provide steep cliff habitat required for nesting. California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDFW-SSC) is not expected to occur within the project area due to removal of vegetation and proximity to paved road, though the species may occur along drainage channels in the project area. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur in the project area and individuals could be killed by project activities. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica National Recreation Area to occur within 1 mile of Site H-69B at an unspecified location within Cold Creek Nature Preserve. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Monarch butterfly (*Danaus plexippus*; ESA-Pet) may pass through the area on migration, though tall trees that may serve as potential roosts within the project area are associated with private property. No aquatic habitats are present in the project area suitable for two-striped garter snake (*Thamnophis hammondi*; CDGF-SSC) or western pond turtle (*Emys marmorata*; CDGF-SSC). Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) is perennial species that was not observed during botanical survey. However, the project area includes chaparral and disturbed soils. There is a potential that this species could emerge, especially after a fire. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Preconstruction surveys would verify if Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) is present; protect as necessary. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Site H-69B may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Freshwater Forested/Shrub wetland feature types as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from storm water runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Most of Site H-69B is comprised of H3 habitat, but Significant Ecological Resource Areas (SERAs) identified at the site include some H2 habitat in the northern portion of the site. The study area for Site H-69B includes H1 habitat and H1 Quiet Zone. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Construction and operations impacts to resources at the site are described in Impact BIO 1, Impact BIO 2, and Impact BIO 3. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2, coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant.

Mitigation Required: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: Yes

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

Yes

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are no previously recorded historical resources within the direct or indirect APEs for this project location. However, during field surveys, prehistoric archaeological sites and features were newly identified that would meet the criteria for historical resources under the CEQA Guidelines. Given the mountainous location and the distribution of the cultural material and features, this project location would also qualify as an archaeological or ethnographic landscape. The condition and status of this project area were confirmed by a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian during field survey. Project activities at the H-69B project location include attachment of whip antennas and microwave dishes on a proposed 180-foot lattice tower and construction of a new equipment shelter, backup generator, and fuel tank. Construction of these structures would cause a substantial adverse change in the significance of the newly identified historical resource within the APE. Archaeological monitors would be present for all ground disturbing activities; however, given the location and extent of the identified resources, impacts could not be avoided and would remain significant. In addition, construction of a 180-foot steel tower and the associated antennas and infrastructure features would be visually out of character for this landscape. Standard approaches to mitigation for towers (painting/camouflage), particularly for towers of this height would not be effective and would not reduce the visual impacts to less than significant levels. In addition, the painting of tall telecommunications towers is controlled by FAA Advisory Circulars 47 CFR § 17.21-17.58 to prevent aviation hazards; therefore, painting would not be a feasible mitigation at this project site. Based on this information, direct and visual impacts at this project location would be

significant and unavoidable and implementation of mitigation measures would not reduce impacts to less than significant levels.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present for all ground disturbing activities; however, given the location and extent of the identified resources, impacts at this project site could not be avoided. Construction of a 180-foot steel tower and the associated antennas and infrastructure features would be visually out of character at this project site and would intrude on the significance of the landscape. Because of FAA requirements for the painting of tall communications towers, CUL MM 5 would not be applicable to this project site and there is no feasible mitigation to reduce visual impacts to less than significant levels.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are no previously recorded historical resources within the direct or indirect APEs for this project location. However, during field surveys, prehistoric archaeological sites and features were newly identified that would meet the criteria for historical resources under the CEQA Guidelines. Given the mountainous location and the distribution of the cultural material and features, this project location may also qualify as an archaeological or ethnographic landscape. The condition and status of this project area were confirmed by a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian during field survey. Project activities at the H-69B project location include attachment of whip antennas and microwave dishes on a proposed 180-foot lattice tower and construction of a new equipment shelter, backup generator, and fuel tank. Construction of these structures would cause a substantial adverse change in the significance of the newly identified historical resource within the APE. Archaeological monitors would be present for all ground disturbing activities; however, given the location and extent of the resources, impacts at this project site could not be avoided. In addition, construction of a 180-foot steel tower and the associated antennas and infrastructure features would be visually out of character for this landscape. Standard approaches to mitigation for towers (painting/camouflage), particularly for towers of this height would not be effective and would not reduce the impacts to less than significant levels. In addition, the painting of tall telecommunications towers is controlled by FAA Advisory Circulars 47 CFR § 17.21-17.58 to prevent aviation hazards; therefore, painting would not be a feasible mitigation at this project site. Based on this information, impacts at this project location would be significant and unavoidable and implementation of mitigation measures would not reduce impacts to less than significant levels.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present for all ground disturbing activities; however, given the location and extent of the identified resources, impacts could not be avoided and would remain significant.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Topanga Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, significant vertebrate fossil localities have been recorded from this formation in the Santa Monica Mountains region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

No human remains have been identified within APE; however, given the nature of the resources newly identified at this project location, the potential for human remains is moderate to high. Given the mountainous location and distribution of the cultural material and features, and the potential for human remains, impacts at this project location would be significant and unavoidable.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present for all ground disturbing activities. However, based on the distribution of the cultural material and features, and the potential for human remains, impacts at this project location would be significant and unavoidable and mitigation measures would not reduce impacts to less than significant levels.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within the APE. However, during the field survey of this project location, Tribal cultural resources as defined by California Assembly Bill 52 were identified within the APE. In addition, the introduction of a 180-foot lattice tower and its associated antennas and infrastructure features would be out of character and would cause a substantial adverse visual effect on the landscape and impacts at this project location would be significant and unavoidable.

Mitigation Measure(s):

CUL MMs 1, 3, and 4 would be implemented at this project site. Archaeological monitors would be present for all ground disturbing activities. However, based on the distribution of the cultural material and features, impacts at this project location would be significant and unavoidable and mitigation measures would not reduce impacts to less than significant levels.

Geology and Soils

Setting

Surface Geology: Tertiary intrusive rocks (hypabyssal), unit 5 (Southern California Basin)

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low to Moderate Potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The Millsholm series consists of shallow, well drained soils that formed in material weathered from sandstone, mudstone and shale often with clay content up to 30%. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site H-69B and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site H-69B was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site H-69B. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site H-69B would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site H-69B, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site H-69B would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: LA County Fire Department Camp 8 Heliport less than 1.5 miles from Project Site

Applicable Emergency Response or Emergency Evacuation Plan: yes

Wildland Fire Risk: yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' Fire Severity zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Mountain Lands (RL20)

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site H-69B is proposed within 500 feet of Saddle Peak Road, a designated Scenic Route within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Land Use Plan Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along (within 200 feet of) Scenic Routes. Land Use Plan Policy CO-152 indicates wireless telecommunication facilities along Scenic Routes should be co-located where feasible and made to blend into the landscape. The proposal is to establish a 180-foot-tall tower at a previously

disturbed site with some existing development, but not developed specifically as a telecommunications site.

In addition, Site H-69B is along an adopted Significant Ridgeline within the Santa Monica Mountains Coastal Zone. Per the Local Implementation Plan adopted in 2014, new development is prohibited along Significant Ridgelines. The highest point of a structure must be located at least 50 vertical feet and 50 horizontal feet from a Significant Ridgeline. Construction of the proposed project facilities at this site (to establish a 180-foot-tall tower) would result in a conflict with the Santa Monica Mountains Land Use Plan because the proposed project exceeds the identified height limitations.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 115 feet

Ambient Noise Level: 55 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable" community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA "normally acceptable" level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers within this distance to the site; therefore, groundborne vibrational noise impacts would be less than significant.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance to the Project site; therefore, impacts from groundborne vibration from construction would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design; therefore, impacts due to excessive groundborne vibration or groundborne noise from Project operation would be less than significant.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 115 feet from proposed sites would be 76 dBA and not exceed the 90 dBA daytime or 80 dBA nighttime criterion; therefore, construction impacts would be less than significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except

for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: S Topanga Canyon Blvd

Distance (Miles): 1.48

Disaster Route: State Route 27

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: State Route 27

Distance (Miles): 1.68

Nearest Major Arterial: Mulholland Hwy

Distance (Miles): 2.57

Access to the Project Site Provided Via: Extension off of Saddle Peak Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST #29

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: JOP

Site Name: Josephine Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of two (2) up to 85kW diesel generators each with up to 1,500 gallon belly tanks. Propose installation of two solar arrays up to 1500 square feet total. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 10,000 square feet

Permanent disturbance area: Up to 8,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles Forest Hwy/Josephine Peak Road

City: Clear Creek/above La Cañada Flintridge

State: CA

Zip: 91011

Latitude: 34.2857814164

Longitude: -118.153848243

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

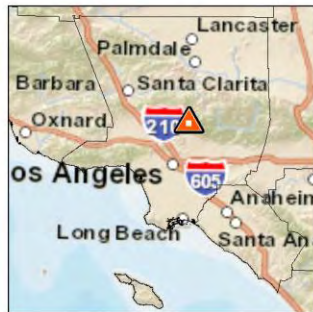
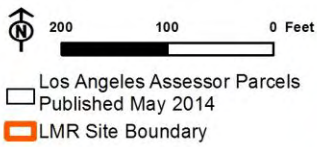
Existing Tower Type: Lattice (guyed)

Existing Tower Height: unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5534

JOP Site Boundary Map



JOP
 Josephine Peak
 Angeles National Forest - 2N64 Josephine Peak
 Unincorporated, CA 91011

Proposed New Site Coordinates (NAD83):
 Latitude: 34.285781
 Longitude: -118.153848
 Elevation (Feet): 5521

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



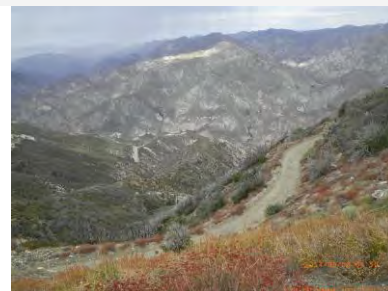
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is approximately 1.0 mile north of the Angeles Crest Scenic Byway. This isolated hilltop site is located in Angeles National Forest on top of Josephine Peak off Josephine Peak Road near the intersection of Angeles Forest Highway and Angeles Crest Highway, a National Forest Scenic Byway, which traverses the base of the peak to the southeast. Steep topography blocks views of this site from both roads, with the exception of the southwestern side. West of the intersection, the scenic byway climbs some hills, from which the top of Josephine Peak would be intermittently visible. Some small solar panels and towers currently exist on the site. A dirt access road encircles the top of the peak, which has little vegetation and appears previously disturbed. Below the dirt access road, trees are more dense to the north of the peak, with some scattered vegetation on the south side of the peak. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back Country (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: State Route 2; Angeles Crest Scenic Byway

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Significant and Unavoidable Impact

Discussion:

The proposed new facilities would be located in an area with no existing tall structures. Given the height of Josephine Peak in relation to the surrounding forest, the new structure would intrude upon scenic vistas in the area. Ongoing and recurring maintenance activities would be barely visible and infrequent. However, because the new lattice tower would introduce a new vertical intrusion onto the landscape, a substantial adverse effect to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

Unavoidable impact. A measure evaluated to address the significant visual impacts included painting the new structures to blend with their visual setting. This measure was determined infeasible because FAA guidelines specify paint colors to be used on structures for aviation safety purposes, and painting the new structures to blend with surroundings would not reduce their visual impact to less than significant levels.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Very little vegetation exists on site. No rock outcroppings, historic buildings, or other scenic resources exist in the area. No damage to vegetation or other elements that would be considered scenic resources would occur during construction.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Significant and Unavoidable Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The new tower and shelter would contrast and be incompatible with the visual character of the landscape, which consists primarily of vegetated forests. The new tower would introduce a new vertical intrusion onto the landscape where other vertical structures do not currently exist resulting in a substantial adverse impact. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

Unavoidable impact. A measure evaluated to address the significant visual impacts included painting the new structures to blend with their visual setting. This measure was determined infeasible because FAA guidelines specify paint colors to be used on structures for aviation safety purposes, and painting the new structures to blend with surroundings would not reduce their visual impact to less than significant levels.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow

from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Federal government building

Distance to Sensitive Receptor: 5523

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site JOP. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site JOP or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site JOP would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site JOP will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site JOP would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site JOP or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site JOP, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site JOP, which is 5,523 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 8 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site JOP and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site JOP in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site JOP and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Coast Range newt (*Taricha torosa*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Greata's aster (*Symphyotrichum greatae*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); Greata's aster (*Symphyotrichum greatae*; 1B.3)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Natural Landscape Block - Pleasant View Ridge;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak chaparral [*Quercus chrysolepis* Shrubland Alliance]; Association- *Quercus chrysolepis*-*Eriogonum fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site JOP is located on a mountain top in the San Gabriel Mountains with sparse chaparral on south-facing slopes and dense Canyon Live Oak forest in the shaded canyons. The bedrock is primarily very old metamorphics and the vegetation is recovering from a recent burn. The vegetation includes bush buckwheat (*Eriogonum fasciculatum*), Our Lord's candle (*Yucca whipplei*), poodle plant (*Turricula parryi*), canyon live oak (*Quercus chrysolepis*), sulfur buckwheat (*Eriogonum umbellatum*), bricklebush (*Brickellia californica*), ceanothus, blackberry, and prickly phlox (*Leptodactylon* sp). American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting (suitable nesting habitat may be present within one mile). The study areas considered to be outside the current range of the

California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. No aquatic, wetland, or aquatic habitats occur within the vicinity of the JOP study area. However, designated critical habitat for the arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC) is in Big Tujunga Canyon, a little more than 1 mile to the north. Though the project site is located in mountain terrain and no aquatic/riparian habitat occurs in the study area, arroyo toads may disperse overland for distances of more than 1.5 miles during rainy periods. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in Mill Creek/Big Tujunga Creek, and in Seco Arroyo, just less than 2 miles to the north and south of Site LACFCP09, respectively. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by the Angeles National Forest to occur within 2 miles of Site JOP in Big Tujunga Canyon. Though the project site is located in mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Aquatic/riparian habitat for Coast Range newt (*Taricha torosa*; CDFW-SSC) does not occur in the project area. Potential habitat for Greata's aster (*Symphyotrichum greatae*; 1B.3) occurs within the survey area but the vegetation is too dense to survey. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC), southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E), California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC), and Greata's aster (*Symphyotrichum greatae*; 1B.3). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing frogs and toads, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measurable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Mark the areas requiring special protection for Greata's aster (*Symphyotrichum greatae*; 1B.3). Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Southern coast live oak riparian forest and woodland is within 500 feet of the project site JOP. Site JOP is hydrologically connected to stream habitats that include southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) occupied and potentially suitable habitat.

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Pleasant View Ridge Natural Landscape Block which overlaps the ranges of approximately 257 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual

species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. The only other recorded cultural resource at this project location (not a historical resource) is P-19-002248H, which consists of the remains of the 1938-era Josephine Peak Lookout tower that was destroyed during the Mill wildfire in 1975 and retains essentially no integrity. LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 70-foot monopole and construction of a new equipment shelter and fuel tank mounted on a concrete pad. This project location is heavily disturbed from the previous construction of a road and the former lookout station. The conditions and status of cultural resources at this project location was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Based on the nature of Resource No. P-19-186535 and the absence of other historical resources, impacts from project activities at this project site would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. The only other recorded cultural resource at this project location (not a historical resource) is P-19-002248H, which consists of the remains of the 1938-era Josephine Peak Lookout tower that was destroyed during the Mill wildfire in 1975 and retains essentially no integrity. LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 70-foot monopole and construction of a new equipment shelter and fuel tank mounted on a concrete pad. This project location is heavily disturbed from the previous construction of a road and the former lookout station. The conditions and status of cultural resources at this project location was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Based on the nature of Resource No. P-19-186535 and the absence of other historical resources, impacts from project activities at this project site would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian rocks, undivided, unit 2 (Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Pismo-Etsel family-Cieneba-Caperton Association

Erosion Potential: Low to Moderate

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The potential erosive properties of this soil type would be confirmed during geotechnical investigation and the results must be considered as part of the overall site design. The proposed building site is relatively flat, though moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site JOP and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site JOP was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site JOP. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site JOP would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site JOP, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site JOP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Backcountry Motorized Use Restricted

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry (Motorized Use Restricted), which includes areas of the national forest that are generally undeveloped with few roads. Few facilities are found in this zone, but some may occur in remote locations. Motorized use is restricted to administrative purposes only; this includes Forest Service, other agency, or tribal government needs, as well as access needed to private land or authorized special-uses. Although this zone allows a range of low intensity land uses, the management intent is to retain the natural character of the zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. The motorized use restriction may entail additional access challenges as use of the administrative roads requires special-use authorization. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar

to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

Some local jurisdictions have established thresholds above which construction vibration becomes perceivable by sensitive receiver locations. If vibration from construction exceeds a specified threshold in a jurisdiction with a vibration ordinance that is applicable to the Authority, this would be a significant impact. If vibration from construction exceeds a specified threshold in a jurisdiction with a vibration ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines

for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry Motorized Use Restricted land use desig

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Josephine Peak is not identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Angeles Forest Hwy

Distance (Miles): 0.86

Disaster Route: State Route 2

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 0.86

Nearest Major Arterial: Big Tujunga Canyon Rd

Distance (Miles): 0.87

Access to the Project Site Provided Via: Josephine Peak Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Scholl Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: JPK

Site Name: Johnstone Peak - 1

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest

City: San Dimas

State: CA

Zip: 91741

Latitude: 34.1603256346

Longitude: -117.798785926

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

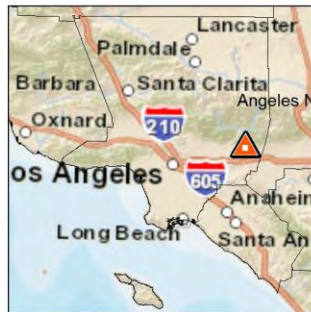
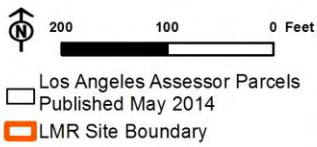
Existing Tower Type: Lattice (multiple)

Existing Tower Height: 100'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3180

JPK Site Boundary Map



JPK

Johnstone Peak-1

Los Angeles National Forest - 1N17 Johnstone Peak Mountain Way and 1N17A Lodi Spur
San Dimas, CA 91741

Proposed New Site Coordinates (NAD83):

Latitude: 34.160318

Longitude: -117.798839

Elevation (Feet): 3173

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



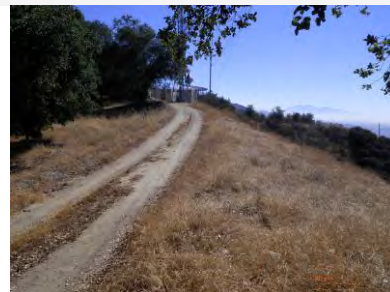
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest on Lodi Lateral Mountain Way near its intersection with Johnstone Peak Truck Trail. The site consists of a utility pole, two lattice towers (the tallest one painted red and white), transformer, equipment compound, and two one-story equipment shelters. The site is on an isolated ridge top in a cleared area surrounded by chaparral vegetation and little development. The JPK2 site, with an existing lattice tower, is approximately 300 feet to the west. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Experimental Forest, which is generally closed to the public except by permit. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Experimental Forest

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. Locating the new tower and equipment with existing structures would concentrate the impacts. The existing towers would attenuate the noticeability of new structures, thereby minimizing visual impacts. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and large lattice tower, as well as the nearby presence of the JPK2 site and its tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and the adjacent JPK2 site. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. Therefore, there would be no change to the designated scenic attractiveness rating. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare

that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 7505

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site JPK. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site JPK or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site JPK would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site JPK will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site JPK would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site JPK or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site JPK, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site JPK, which is 7,505 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 10 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site JPK and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site JPK in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site JPK and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger

public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Coast Range newt (*Taricha torosa*; CDFW-SSC); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Greata's aster (*Symphyotrichum greatae*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); many-stemmed dudleya (*Dudleya multicaulis*; CA-1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

round-leaved filaree (*California macrophylla*; 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA - San Dimas Canyon/San Antonio Canyon; SCAG Zoning - Open Space and Recreation; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga; Natural Landscape Block - San Dimas

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Eriogonum fasciculatum*

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site JPK is located on a mountain top in the San Gabriel Mountains and contains chamise chaparral on the south-facing slopes and oak woodland and forest on the north-facing slopes. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. The project area does not contain habitat wet enough to sustain Greata's aster (*Symphyotrichum greatae*; 1B.3). The site contains moderate quality habitat for round-leaved filaree (*California macrophylla*; 1B.1), though it was not detected in

surveys conducted 8/14/2014. Aquatic/riparian habitat for Coast Range newt (*Taricha torosa*; CDFW-SSC) and two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC) does not occur in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Conduct spring botanical surveys for round-leaved filaree (*California macrophylla*; 1B.1); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 18 Nesting Bird Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Dimas Natural Landscape Block which overlaps the ranges of approximately 272 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga that connects San Gabriel Mountains from Pleasant View Ridge eastward through Table Mountain to San Bernardino Mountains. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The SEA notes the specific habitat for thread-leaf brodiaea in the vicinity. The woodland and riparian habitat within the SEA specifically are used by special status wildlife species during part of their life cycle. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations JPK and JPK2 are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by both P-19-186535 and P-19-187829. There are no other historical resources within the direct or indirect APEs. The LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower and construction of a new equipment shelter and fuel tank mounted on a concrete pad, all enclosed by a chain-link fence. The condition and status of cultural resources at this project location were

confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829 and the lack of any resource-associated features; the small footprint of the project site; and the absence of other historical resources, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations JPK and JPK2 are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by both P-19-186535 and P-19-187829. There are three additional recorded resources within this project location's indirect APE. The first is P-19-002054, the Johnstone Peak Lookout tower, which is situated approximately 350 feet northeast of the direct APE, has been determined to be not eligible for inclusion in the National Register of Historic Places, and has been converted internally and externally into a communications-related site that includes the building, structures, and a lattice towers, all surrounded by a chain-link fence. The second and third sites are FS-05015200153, a prehistoric archaeological site consisting of five lithic artifacts situated in the southeastern-most quadrant of the indirect APE and P-19-187815, a segment of the Sycamore Flat Motorway (Forest Road 1N15), which crosses the southwestern-most boundary of the indirect APE; neither of these recorded resources are historical resources. The LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower and construction of a new equipment shelter and fuel tank mounted on a concrete pad, all enclosed by a chain-link fence. This project location is heavily disturbed from the previous construction of an existing communications facility (including a lattice tower). The conditions and status of cultural resources at this project location was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829 and the lack of any uniquely definable resource-associated features; the small footprint of the project site; and the absence of other historical resources, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) at this project site. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Low to Moderate based on designation within Landslide Zone and proximity to Fault Line

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: Low to Moderate

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line was identified approximately 1/8 mile south of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and

Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, gravelly silt loam that has a rapid runoff characteristics with moderately permeability. This condition increases erosion hazards in areas of sloping terrain; however, the proposed building site is on relatively flat grade. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site JPK and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site JPK was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site JPK. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site JPK would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site JPK, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site JPK would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: San Dimas

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Experimental Forest

Zoning: Watershed

What is the zoning height restriction, if any?:

12 feet; 30 feet if designed as public art

City or county permit requirements for communication facilities, if any:

City of San Dimas prohibits monopolies in Watershed zone, but City authority would not apply to Forest Service land; Forest Service requires Special Use Authorization

Comprehensive Plan or General Plan Local Agency: San Dimas

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for telecommunication facilities, the maximum allowable height of structures is 12 feet or 30 feet if designed as public art. Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. In addition, city policy is to preserve existing ridgelines to preserve views and viewsheds of the foothills and the proposed structure would be on a ridgeline within the foothills north of the city. Because the Authority is exercising intergovernmental immunity, the City of San Dimas General Plan is not applicable and no conflict with the plan exists.

Furthermore, while the site is within the city planning boundary and zoning designation exists, the site is within Angeles National Forest where federal land use jurisdiction takes precedence.

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Experimental Forest. The Experimental Forest zone serves as a research and demonstration area, and is generally closed to the public except by permit. Access is controlled. The San Dimas Experimental Forest (SDEF) is a protected field laboratory for studies of hydrology, fire, and other topics relating to the ecology of chaparral and related ecosystems. It has been closed to the general public, except under special written permit. Uses within the SDEF include a communications site that was authorized by special-use authorization (USFS, Pacific Southwest Region 2005b).

Communications sites may be permitted within the SDEF, but would require special-use authorization. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. No land use plan incompatibility impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: San Dimas

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.36 Noise Ordinance

Noise Level Threshold: N/A; no construction from 8 pm to 7 am or any time on Sundays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Experimental Forest land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Johnstone Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 2.77

Disaster Route: Route 66

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 4.7 miles from Brackett Field Airport

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 2.71

Nearest Major Arterial: Amelia Ave

Distance (Miles): 2.05

Access to the Project Site Provided Via: Lodi Lateral Mtwy

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None Required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles

bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None Required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site JPK is more than 20,000 feet from an identified airport or heliport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 180-foot-tall lattice tower with up to a 15-foot lightning rod), the TOWAIR tool indicates that the antenna structure is a "pass slope determination," which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None Required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None Required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: JPK2

Site Name: Johnstone Peak - 2

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Sycamore Canyon Rd

City: San Dimas

State: CA

Zip: 91741

Latitude: 34.1602571999

Longitude: -117.799626716

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (multiple)




Existing Tower Height: 100'; unknown

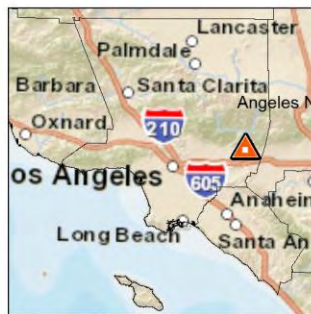
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3183

JPK2 Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



JPK-2

Johnstone Peak-2

Los Angeles National Forest - 1N17 Johnstone Peak Mountain Way and 1N17A Lodi Spur
San Dimas, CA 91741

Proposed New Site Coordinates (NAD83):

Latitude: 34.160253

Longitude: -117.799606

Elevation (Feet): 3181

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



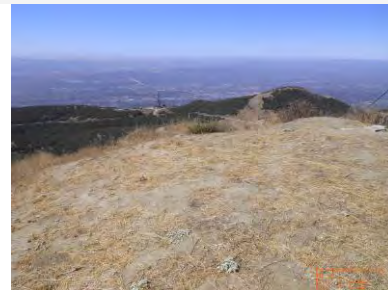
Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in approximately 300 feet west of the JPK site in Angeles National Forest, and the same conditions apply. The site is on an isolated ridge top in a cleared area surrounded by chaparral vegetation and little development. The site consists of dirt ground with two very small shelters and lattice tower with attached microwave antennas, which are enclosed by a chain link fence. A shorter monopole with attached antennas is adjacent to a small shelter outside of this compound. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Experimental Forest, which is generally closed to the public except by permit. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Experimental Forest

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within a site that includes an existing tower that already creates a visual intrusion onto the landscape. Locating the new tower and equipment with existing structures would concentrate the impacts. The existing towers would attenuate the noticeability of new structures, thereby minimizing visual impacts. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of an existing site and large lattice tower, as well as the nearby presence of the JPK site and its two towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and the adjacent JPK site. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. Therefore, there would be no change to the designated scenic attractiveness classification. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare

that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 7313

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site JPK2. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site JPK2 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site JPK2 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site JPK2 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site JPK2 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site JPK2 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site JPK2, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site JPK2, which is 7,313 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 10 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site JPK2 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site JPK2 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site JPK2 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Coast Range newt (*Taricha torosa*; CDFW-SSC); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Greata's aster (*Symphotrichum greatae*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); many-stemmed dudleya (*Dudleya multicaulis*; CA-1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

round-leaved filaree (*California macrophylla*; 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA - San Dimas Canyon/San Antonio Canyon; SCAG Zoning - Open Space and Recreation; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga; Natural Landscape Block - San Dimas

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Eriogonum fasciculatum*

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site JPK2 is located on a mountain top in the San Gabriel Mountains and contains chamise chaparral on the south-facing slopes and oak woodland and forest on the north-facing slopes. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. The site does not contain habitat wet enough to sustain Greata's aster (*Symphotrichum greatae*; 1B.3). The site contains moderate quality habitat for round-leaved filaree (*California macrophylla*; 1B.1). Aquatic/riparian habitat for Coast Range

newt (*Taricha torosa*; CDFW-SSC) and two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC) does not occur in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) would be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Conduct spring botanical surveys for round-leaved filaree (*California macrophylla*; 1B.1); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 18 Nesting Bird Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Freshwater Forested/Shrub wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to an ephemeral drainage. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

Implementation of best management practices for control of erosion and sedimentation.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Dimas Natural Landscape Block which overlaps the ranges of approximately 272 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga that connects San Gabriel Mountains from Pleasant View Ridge eastward through Table Mountain to San Bernardino Mountains. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations JPK2 and JPK are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by both P-19-186535 and P-19-187829. There are no other historical resources within the direct or indirect APEs. The LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower and construction of a new equipment shelter and fuel tank mounted on a concrete pad, all enclosed by a chain-link fence. The condition and status of cultural resources at this project location were

confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829 and the lack of any resource-associated features; the small footprint of the project site; and the absence of other historical resources, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations JPK2 and JPK are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by both P-19-186535 and P-19-187829. There are no other historical resources within the direct or indirect APEs. The LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower and construction of a new equipment shelter and fuel tank mounted on a concrete pad, all enclosed by a chain-link fence. The condition and status of cultural resources at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829 and the lack of any uniquely definable resource-associated features; the small footprint of the project site; and the absence of other historical resources, impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) at this project site. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Low to Moderate based on designation within Landslide Zone and proximity to Fault Line

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: Low to Moderate

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line was identified approximately 1/8 mile south of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and

Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is comprised of well-drained, gravelly silt loam that has a rapid runoff characteristics with moderately permeability. This condition increases erosion hazards in areas of sloping terrain; however, the proposed building site is on relatively flat grade. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site JPK2 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site JPK2 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site JPK2. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site JPK2 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site JPK2, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site JPK2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: San Dimas

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Experimental Forest

Zoning: Watershed

What is the zoning height restriction, if any?:

12 feet; 30 feet if designed as public art

City or county permit requirements for communication facilities, if any:

City of San Dimas prohibits monopolies in Watershed zone, but City authority would not apply to Forest Service land; Forest Service requires Special Use Authorization

Comprehensive Plan or General Plan Local Agency: San Dimas

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for telecommunication facilities, the maximum allowable height of structures is 12 feet or 30 feet if designed as public art. Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. In addition, city policy is to preserve existing ridgelines to preserve views and viewsheds of the foothills and the proposed structure would be on a ridgeline within the foothills north of the city. Because the Authority is exercising intergovernmental immunity, the City of San Dimas General Plan is not applicable and no conflict with the plan exists.

Furthermore, while the site is within the city planning boundary and zoning designation exists, the site is within Angeles National Forest where federal land use jurisdiction takes precedence.

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Experimental Forest. The Experimental Forest zone serves as a research and demonstration area, and is generally closed to the public except by permit. Access is controlled. The San Dimas Experimental Forest (SDEF) is a protected field laboratory for studies of hydrology, fire, and other topics relating to the ecology of chaparral and related ecosystems. It has been closed to the general public, except under special written permit. Uses within the SDEF include a communications site that was authorized by special-use authorization (USFS, Pacific Southwest Region 2005b).

Communications sites may be permitted within the SDEF, but would require special-use authorization. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. No land use plan incompatibility impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: San Dimas

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.36 Noise Ordinance

Noise Level Threshold: N/A; no construction from 8 pm to 7 am or any time on Sundays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 dBA daytime criterion but would exceed FTA threshold 80 dBA nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Experimental Forest land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Johnstone Peak is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 2.76

Disaster Route: Route 66

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 4.7 miles from Brackett Field Airport

Nearest Highway/Freeway: Route 66/Foothills Blvd

Distance (Miles): 2.76

Nearest Major Arterial: Amelia Avenue

Distance (Miles): 2.05

Access to the Project Site Provided Via: Lodi Lateral Mtwy

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None Required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles

bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None Required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site JPK2 is more than 20,000 feet from an identified airport or heliport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 180-foot-tall lattice tower with up to a 15-foot lightning rod), the TOWAIR tool indicates that the antenna structure is a "pass slope determination," which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None Required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None Required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LACF072

Site Name: County FS 72

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

- Temporary disturbance area (includes staging): Up to 5,000 square feet
- Permanent disturbance area: Up to 3,000 square feet
- Excavation: Up to 150 cubic yards removed
- Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide
- Proposed foundations include:
 - o Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation
 - o Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter
 - o Up to 200 square feet x 18 inch concrete slab for generator
- Demolition of existing pavement and/or structures

Address: 1832 S Decker Rd

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0768062551

Longitude: -118.880933492

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A




Existing Tower Height: N/A

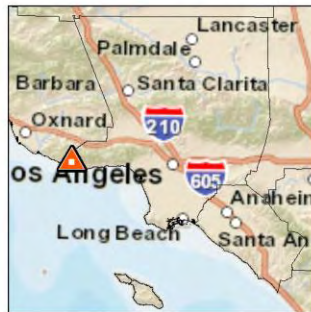
Existing Site Use: County Fire Station

Existing Ground Elevation (feet AMSL): 1626

LACF072 Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



LACF072

County FS 72
1832 S. Decker Rd.
Unincorporated, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.076581
Longitude: -118.881059
Elevation (Feet): 1623

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is Los Angeles County Fire Station 72 located on Decker Canyon Road (Highway 23), a paved two-lane road that is a Scenic Route as designated under the Santa Monica Mountains Coastal Program Land Use Plan. Decker Canyon Road traverses the nearby Santa Monica Mountains NRA generally north to south and connects to Mulholland Scenic Highway. The site consists of a single one-story fire station and flag pole. A broad, flat parking area and low-rise metal shelter are located across the highway. Views along the roadway corridor include telephone poles, chaparral vegetation, and occasional residences. Views are dominated by the road corridor, a distant, relatively flat mountain horizon, and telephone poles and lines. The setting is mostly semi-rural, with some estate homes scattered along the road. Primary sensitive viewers are travelers along Decker Road.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Decker Canyon Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be constructed along the eastern boundary of the fire station property in an undeveloped moderately wooded area on a low hill. The height of the new monopole would be similar to the surrounding trees, and would also be elevated above Decker Canyon Road on a hill that is obscured from view by cut banks. The monopole would be of similar height as the telephone poles that line the road and the flagpole at the fire station. The undulating nature of Decker Canyon Road and its many curves and cut banks, as well as the presence of mature vegetation along the road, would obscure most views of the site. There would be no change to the road's scenic route designation. The site would not interfere with scenic vistas in SMMNRA given the stature of the new monopole and its location in the landscape. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some trees would be disturbed to accommodate the new facilities and construction staging area. Operation of the project would result in no removal of or damage to trees, rock outcroppings, or historic buildings that constitute scenic resources.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of telephone poles and lines that parallel the road. The new monopole would be largely obscured by surrounding vegetation and topography. Therefore, the new facilities would be compatible with the visual character of the surrounding landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 40

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LACF072. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LACF072 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site LACF072 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LACF072 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LACF072 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LACF072 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LACF072, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LACF072, which is 40 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for CO, No_x, lower for PM₁₀, PM 2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LACF072 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LACF072 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LACF072 and all proposed Projects sites

would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

monarch butterfly (*Danaus plexippus*; ESA-Pet); western pond turtle (*Emys marmorata*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Santa Monica dudleya (*Dudleya cymosa* ssp. *Ovatifolia*; ESA-T, 1B.2); Sonoran maidenfern (*Thelypteris puberula* var. *sonorensis*; 2B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1); marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*; ESA-T, CA-R, CNPS-1B.2); Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*; ESA-T, CNPS 1B.2); Sonoran maidenfern (*Thelypteris puberula* var. *sonorensis*; 2B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains Coastal Resource Area; NPS- Santa Monica Mountains National Recreation Area;

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Coast live oak woodland [*Quercus agrifolia* Woodland Alliance]; Association - *Quercus agrifolia*-*Artemisia californica*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LACF072 is located in a suburban/rural setting on a hillside slope in the Santa Monica Mountains adjacent to a paved road in association with a fire station. The project site is within an existing fenced facility, landscaped with ornamental vegetation including several large non-native trees; no native habitats are present on site. The project area includes residences and corrals on neighboring properties. Less disturbed areas include chaparral vegetation with coast live oak (*Quercus agrifolia*) woodlands and patches with coastal sage scrub components, including scattered flattop buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), California sagebrush (*Artemisia californica*), and mountain mahogany (*Cercocarpus* sp.). Monarch butterflies (*Danaus plexippus*; ESA-

Pet) may pass through the project area and suitable roost trees are present. Aquatic habitat for the western pond turtle (*Emys marmorata*; CDFW-SSC) does not occur within the project area. The project site has been highly modified from natural conditions, with no native habitats present. Though no occurrences of Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) are recorded within 1 mile and the closest populations are northwest of the site in the Santa Monica Mountains, adjacent lands within the study area, primarily on the opposite side of SR-23, may provide habitat for Braunton's milk-vetch. Braunton's milk-vetch is a fire follower that also occurs in openings and disturbed areas in chaparral. This species could occur within the study area northeast of the site in what is considered poor quality habitat; the slopes are too steep to survey. Though no occurrences of Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1) are recorded within 1 mile, adjacent lands within the study area, primarily on the opposite side of SR-23, may provide habitat for Lyon's pentachaeta. Designated critical habitat is located about 1.5 miles to the northeast. This species could occur within the study area; the slopes are too steep to survey. Marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*; ESA-T, CA-R, CNPS-1B.2), Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*; ESA-T, CNPS 1B.2), and Sonoran maidenhair fern (*Thelypteris puberula* var. *sonorensis*; 2B.2) were not observed on the 8/5/2014 habitat assessment survey, though potentially suitable habitat is present and require spring surveys. The steep slopes would likely preclude a thorough survey of the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Conduct spring botanical surveys for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1), Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1), marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*; ESA-T, CA-R, CNPS-1B.2), Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*; ESA-T, CNPS 1B.2), Sonoran maidenhair fern (*Thelypteris puberula* var. *sonorensis*; 2B.2); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Inspect trees for roosting monarch butterflies (*Danaus plexippus*; ESA-Pet). Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Sensitive Community -Southern coast live oak riparian forest and woodland is within study area.

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Most of Site LACF072 is comprised of H3 habitat, but Significant Ecological Resource Areas (SERAs) identified at the southwestern side of the site include some H2 habitat. The northern portion of the study area for Site LACF072 (across Decker Canyon Road) and the southwestern edge of the study area include H2 habitat. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Construction and operations impacts to resources at the site are described in Impact BIO 1 and Impact BIO 3. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1, coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 Worker Environmental Awareness Program
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials

Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protectio

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the absence of

historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Tertiary volcanic flow rocks, unit 8 (Southern California Basin)

Stability: Moderate pending geotechnical analysis

Soil Type: Rock outcrop-Lithic Xerorthents-Hambright-Gilroy Association

Erosion Potential: Low to Moderate

Expansive Soil: Low to Moderate

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a fine-grained silt/clay material. This soil type exhibits a well-drained, medium to very rapid runoff with moderate permeability equating to moderate erosion resistance. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. The potential erosive properties of this soil type would be confirmed during geotechnical investigation and the results must be considered as part of the overall site design. Site design and construction would be required to conform to the current California Building Code (CBC), local building codes, and existing General Plan policies to ensure the site and its elements would be designed to minimize soil erosion.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located in rolling hills near the top of a hill, with shallow bedrock, on a relatively flat area. The fire station is within a small complex of buildings and the monopole would be placed in previously developed area within a paved area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LACF072 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LACF072 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LACF072. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LACF072 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LACF072, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LACF072 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Los Angeles County Fire Heliport

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: Permitted UST located on-site

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Conejo-tierra Rejada Volcanic

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Public and Semi-Public Facilities

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LACF072 is proposed along Decker Road, a designated Scenic Route within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Land Use Plan Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along Scenic Routes. Land Use Plan Policy CO-152 indicates wireless telecommunication facilities along Scenic Routes should be co-located where feasible and made to blend into the landscape. The proposal is to mount whip and microwave antennas on a proposed 70-foot-tall monopole at a site

with existing development, but not developed specifically as a telecommunications site. Construction of the proposed project facilities at this site would result in a significant conflict with the Santa Monica Mountains Land Use Plan. The proposed action is not in compliance with the adopted and certified Land Use Plan because the proposed project exceeds the identified height limitations.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 65 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at site LACF072. However, the county ordinance has not defined impacts for groundborne noise; therefore, the potential of the project to result in exposure of persons to or generation of excessive groundborne noise levels is less than significant.

The ordinance for unincorporated Los Angeles County requires that vibration levels during construction not exceed a motion velocity of 0.01 peak particle velocity (PPV) in in/sec over the range of 1 to 100 Hertz as specified in the local ordinance. Although levels in excess of 0.01 PPV are still well below the potential damage criteria set by the FTA, 0.12 PPV for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings, the ordinance prohibits construction activities in excess of this threshold. Vibration levels from construction equipment used for this Project would range from 0.003 PPV at 25 feet for a jackhammer to 0.089 PPV for a loaded truck such as the 3-ton flatbed. Applying the damage assessment methodology developed by FTA and described in Appendix B-3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold for unincorporated Los Angeles County is 97 feet.

Sensitive receivers (scattered residential dwellings) are located within 65 feet of Project site LACF072. Vibration from loaded trucks such as the 3-ton flatbed or dump trucks could be as high as 0.018 PPV depending on the geology, soil type and stiffness; therefore, impacts from construction of the Project could expose these sensitive receiver locations to excessive groundborne vibration and impacts of the proposed Project would be significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, operational groundborne vibration or noise would be less than significant during operation of each Project site including LACF072.

At site LACF072, where construction vibration levels would exceed the unincorporated Los Angeles County

vibration ordinance threshold, NOI MM 1 would be required.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site LACF072, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.
- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 81 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

Prior to commencement of construction at Seit LAC072 the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime

threshold. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within the vicinity (approximately 2 miles) of a private airstrip (Los Angeles County Fire Department Heliport), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as LACF072, this combined baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-Db threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, this site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Conservatively assuming a 65 dBA CNEL at proposed Project sites located 0.25 miles from private airstrips, operation of this Project site, including the HVAC systems and emergency generators, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of this Project site would not expose people residing or working in the Project area to excessive noise levels. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Decker Rd

Distance (Miles): 0

Disaster Route: State Route 23

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: State Route 23

Distance (Miles): 0

Nearest Major Arterial: Lechusa Rd

Distance (Miles): 0.16

Access to the Project Site Provided Via: Decker Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None Required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None Required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None Required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None Required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LACFCP08

Site Name: LA County Fire Camp 8

Site Discussion:

Propose installation of up to 27 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Unnamed road – nearest intersection Rambla Pacifico St

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0596889239

Longitude: -118.646343982

Jurisdiction:

Landowner: US Government, National Park Service

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

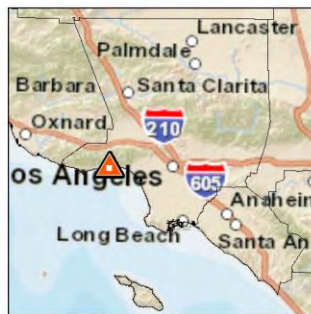
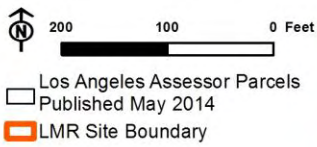
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: County Fire Camp

Existing Ground Elevation (feet AMSL): 1560

LACFCP08 Site Boundary Map



LACFCP08

Camp 8
Rambla Pacifico St.
Unincorporated, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.059584

Longitude: -118.647059

Elevation (Feet): 1552

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in the Santa Monica Mountains National Recreation Area (NRA) southeast of the intersection of Rambla Pacifico Street and Los Flores Canyon Road behind a large Los Angeles County Fire Camp (Camp 8). Camp 8 is a “sprawling” compound that is a former Army nuclear missiles base and is now used by firefighters that operate helicopters from the site to combat wildland fires. There are numerous buildings on the grounds including a cafeteria, a common room, offices, dorm-style bedrooms and multiple helipads (Malibu Times 2015). The site is on a hilltop that appears to have been flattened to accommodate a large paved or concrete foundation or landing area comprising approximately 800 square feet. This area, and most of the Camp 8 facilities, is not visible from Rambla Pacifico Street. Telephone poles line both roads. Los Angeles County has designated a “public viewing area” on Rambla Pacifico Street just northwest of the intersection. Rambla Pacifico Street is a scenic route as designated under the Santa Monica Mountains Coastal Program Land Use Plan. The site is also located on a ridgeline designated by the county as “significant.” Residential subdivisions exist directly north and northeast of the site. Topography varies and vegetation consists of mostly low chaparral. Dominant views are the roadway, telephone poles and lines, and slightly undulating horizon line. Sensitive viewers are NRA visitors.

Visual Sensitivity: High

On federally administered public lands: Yes, National Park Service

If yes, enter applicable ratings: None

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Rambla Pacifico Street

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located within a site that has already been highly disturbed. Despite this high degree of disturbance, the site is not easily visible from the scenic route or other readily accessible viewpoints due to highly varying topography, road curves, and the presence of trees and mature landscaping. The new facilities would not block or remove views given the degree to which the site is currently obscured by topography and vegetation. In addition, the relatively low height and narrow girth of the monopole would not be sufficient to cause a substantial impact on scenic vistas. Ongoing and recurring maintenance activities would be barely visible and infrequent. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Low vegetation exists at the site, with a few scattered trees at the perimeter of the site. No rock outcroppings, historic buildings, or other scenic resources exist in the area. No substantial damage to scenic resources would occur during construction.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site itself is low given the extent of the previous disturbance and current use as a helicopter launch area. Although the monopole and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. In addition, this large disturbed area and the majority of the Camp 8 facilities are not readily visible from area vantage points, and would therefore not affect the area's visual character or quality, or the significance of the ridgeline. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity traveling to and from the site.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 281

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LACFCP08. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LACFCP08 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site LACFCP08 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LACFCP08 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LACFCP08 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LACFCP08 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LACFCP08, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LACFCP08, which is 281 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for CO, NO_x, lower for PM₁₀, PM 2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LACFCP08 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LACFCP08 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LACFCP08 and all proposed Projects sites

would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon - foraging (*Falco peregrinus anatum*; CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica National Recreation Area (NPS); SEA/CRA - Santa Monica Mountains; SCAG Zoning - Beach Parks (Malibu Coastal Zone); Los Angeles County Zoning - Open Space; Natural Landscape Block - Las Flores/Santa Monica Mountains

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Santa Monica Mountains National Recreation Area General Management Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Laurel sumac scrub [*Malosma laurina* Shrubland Alliance]; Association -

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LACFCP08 is located on a broad hilltop in the Santa Monica Mountains, adjacent to a large complex of structures, paved areas, and ornamental vegetation. The surrounding slopes are coastal sage scrub/chaparral vegetation community. There is some native vegetation within the survey area. The vegetation is too dense and the slopes too steep and rocky to walk. The site is located on cut and fill slopes with mostly weedy annuals. The south-facing slopes contain coastal sage scrub and the north facing slopes contain chaparral. The dominant native shrubs are chamise (*Adenostoma fasciculata*), bush buckwheat (*Eriogonum fasciculatum*), redberry (*Rhamnus*

crocea), deerweed (*Acmispon glaber*), and laurel sumac (*Malosma laurina*). American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass by the site while foraging, but the project area does not provide steep cliff habitat required for nesting. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica National Recreation Area to occur within 1 mile of Site LACFCP08 at an unspecified location within Cold Creek Nature Preserve. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Monarch butterflies (*Danaus plexippus*; ESA-Pet) may pass through the project area, though suitable roost trees are not present. Potentially suitable habitat for Branton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) occurs in the study area in chaparral vegetation following fires. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Patches of native vegetation are within the mapped project footprint. Preconstruction surveys for Branton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) would verify if present; protect as necessary. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Site LACFCP08 may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). This wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Las Flores/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 302 amphibian, reptile, mammal and bird species. The site is also located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the SMMNRA GMP would be made by the NPS. Construction activities could impact species and introduce non-native species, conflicting with SMMNRA GMP goals.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, National Park Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: Yes

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are no previously recorded historical resources within the direct or indirect APEs at this project location. However, during field surveys previously unrecorded technical and administrative features of a Cold War-era Nike missile complex were identified within both the direct and indirect APEs that would meet the criteria for historical resources under the CEQA Guidelines. The complex, historically known as LA-78 (Malibu), is a Nike launch site and is one of two related elements associated with the Nike missile program at this general location. The second element (the LA-78 Integrated Fire Control [IFC]), is situated approximately 1.3 miles to the northwest. Both elements of the complex were among 16 Nike missile facilities constructed in a ring around the greater Los Angeles area to defend against Soviet long-range bomber aircraft. LA-78 was activated in 1963 and the entire Nike system was deactivated in 1974. Although this complex has not been formally evaluated for inclusion in the National Register of Historic Places (National Register) or California Register of Historical Resources (CRHR) there is a high probability that it would meet the eligibility criteria for inclusion in both. As a result, the Nike complex at LACFCP08 is treated as an eligible single resource consisting of multiple contiguous, interrelated, technical and administrative elements. Proposed LMR construction at the LACFCP08 project location includes the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a new back-up generator and fuel tank on a concrete pad. Construction of these proposed structures would adversely affect the newly identified resources at this project location directly and visually. The condition and status of this project location was confirmed through archival research and during a field survey

conducted by a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. LACFCP08 is treated as a potentially eligible historical resource and project activities would have a direct effect from ground disturbance and indirect (visual) adverse effect from erection of an out of character element into the Nike landscape. Given the magnitude of the project and the extent of the resources present at this project site, even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels; therefore, impacts would be unavoidable and significant.

Mitigation Measure(s):

With implementation of CUL MMs 2, 3, and 5 impacts would be minimized through archaeological monitoring for subsurface historical artifacts and through camouflage to disguise the proposed monopole; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures, impacts would be significant and would not be reduced to less than significant levels. Because LACFCP08 is on land owned and administered by the National Park Service, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are no known historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); however, given the nature of this project site, there is a high probability that subsurface Cold War-era Nike missile site artifacts and features are present. Therefore, project activities would cause a significant and unavoidable impact and mitigation measures would not reduce those impacts to less than significant.

Mitigation Measure(s):

CUL MMs 2 and 3 would be implemented at this project site. Archaeological monitors would be present during all ground disturbing activities to minimize impacts; however, impacts would be significant and implementation of CUL MMs 2 and 3 would not reduce impacts to less than significant.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as low sensitivity artificial fill at the surface. However, these deposits overlie the Santa Susana, which has a moderate potential for significant vertebrate fossils. No localities are recorded within the proposed site; however this formation has produced fossil specimens of eagle ray, primitive shark, dogfish shark, bonito shark, lemon shark, and the holotype of the chimaeroid *Ischyodus zinsmeisteri* in the Santa Monica Mountains region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Periodic paleontological spot checks are required during excavation into the artificial fill to determine if Santa Susana Formation is present. If present, monitoring would be conducted during excavation into paleontologically sensitive sediments to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Paleocene marine rocks, unit 1 (Central and Southern California)

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained, light clay loam with low to very high runoff and moderate permeability. Moderate slopes surround the flat site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. The potential erosive properties of this soil type would be confirmed during geotechnical investigation and the results must be considered as part of the overall site design.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical

analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LACFCP08 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LACFCP08 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LACFCP08. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LACFCP08 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LACFCP08, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LACFCP08 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: NPS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space - Parks

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LACFCP08 is proposed along an adopted Significant Ridgeline within the Santa Monica Mountains Coastal Zone. The site is also within 1,100 feet of Las Flores Canyon Road, a designated Scenic Route. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Per the Local Implementation Plan adopted in 2014, new development is prohibited on Significant Ridgelines. Structures must be located sufficiently below Significant Ridgelines so that the highest point of a structure is located at least 50 vertical feet and 50 horizontal feet from a Significant Ridgeline. The proposal is to mount whip and microwave

antennas on a proposed 70-foot-tall monopole at a site with existing development, but not developed specifically as a telecommunications site. This would result in a conflict with the Santa Monica Mountains Land Use Plan because the proposed project exceeds the identified height limitations and would be along a Significant Ridgeline where development is not allowed.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Site LACFCP08 is also on National Park Service Land. In accordance with the Superintendent's Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority (NPS 2014b), construction of a structure requires a permit from the Superintendent, but wireless communications site development or use are not otherwise specified for this unit of the NPS system. The Authority would apply for the permit and adhere to the terms and conditions.

The final determination of consistency for sites LACFCP08 and PWT would be made by NPS. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and this is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within the vicinity (approximately 2 miles) of a private airstrip (Camp 8 Heliport), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as LACFCP08, this combined baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-Dba threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, this site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Conservatively assuming a 65 dBA CNEL at proposed Project sites located 0.25 miles from private airstrips, operation of this Project site, including the HVAC systems and emergency generators, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of this Project site would not expose people residing or working in the Project area to excessive noise levels. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: Yes

If yes, Plan or Designation Area: Located within National Park Service administered land in the Santa Monica Mountains National Recreation Area

National or California State Park: Yes

If yes, Plan or Designation Area: Santa Monica Mountains National Recreation Area

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Within Santa Monica Mountains National Recreation Area

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles): 1.41

Disaster Route: Pacific Coast Highway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No

Nearest Highway/Freeway: Us Highway 101

Distance (Miles): 1.41

Nearest Major Arterial: Highway N-1

Distance (Miles): 2.67

Access to the Project Site Provided Via: extension off Rambia Pacifico Street

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None Required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None Required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None Required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None Required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LACFCP09

Site Name: LA County Fire Camp 9

Site Discussion:

Propose installation of up to 27 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 21521 N Sand Canyon Rd

City: Santa Clarita

State: CA

Zip: 91350

Latitude: 34.352488082

Longitude: -118.411251573

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A

Existing Tower Height: N/A

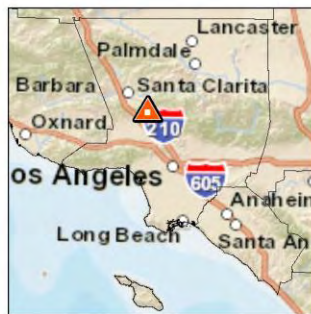
Existing Site Use: County Fire Camp

Existing Ground Elevation (feet AMSL): 3866

LACFCP09 Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels Published May 2014
- LMR Site Boundary



LACFCP09

County CP 9
 Angeles National Forest - 3N17.9 Santa Clara Divide
 Unincorporated, CA 91387

Proposed New Site Coordinates (NAD83):

Latitude: 34.352688
 Longitude: -118.411338
 Elevation (Feet): 3867

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



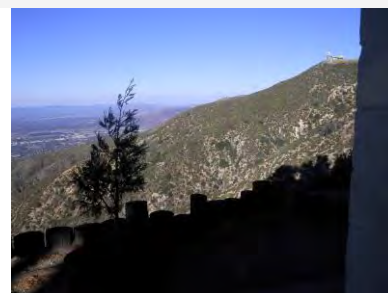
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in Angeles National Forest at a Los Angeles County Fire Suppression Camp on a ridge top on the Santa Clarita Truck Trail, which is a narrow, shoulderless paved rural local road. This road does not provide access to designated recreation destinations. The camp consists of several one-story buildings and two helicopter landing pads, primarily surrounded by evergreen and deciduous trees. The site includes an existing lattice tower, and two additional towers can be seen farther west of the site on the approach from North Sand Canyon Road. Otherwise, this site is not visible from sensitive vantage points. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High/SAC B; Back Country

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing site includes a slender lattice tower of unknown height, which creates a visual intrusion onto the landscape. However, several tall evergreen trees absorb this impact. Locating the proposed new monopole and equipment adjacent to the existing structures and tall trees would concentrate the impacts. The existing tower and trees would attenuate the noticeability of new monopole, thereby minimizing visual impacts to scenic vistas. Minimal impacts would occur given the site's distance from viewpoints, and the relatively low height and small girth of the monopole. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The new structures would be compatible with the existing site, which is a fire camp with associated facilities. The views of intermittent presence of helicopters also somewhat detract from the existing visual character and quality. The low height of the new monopole would result in minimal impacts to the surrounding visual character, resulting in no change to the site's scenic attractiveness rating. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 50

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LACFCP09. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LACFCP09 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site LACFCP09 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LACFCP09 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LACFCP09 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LACFCP09 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LACFCP09, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LACFCP09, which is 50 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 13 are higher than the SCAQMD thresholds for CO, NO_x, lower for PM₁₀, PM 2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LACFCPD09 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LACFCP09 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LACFCP09 and all proposed Projects sites

would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA – Santa Clara River; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Contract Point - Santa Susana Mountains; Natural Landscape Block - Contract Point

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Eastwood manzanita chaparral [*Arctostaphylos glandulosa* Shrubland Alliance]; Association - *Arctostaphylos glandulosa*-*Cercocarpus montanus*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LACFCP09 is located on a mountain ridge in the San Gabriel Mountains with montane chaparral on the south-facing slopes and Big-cone douglas fir and yellow pine forest on the north-facing slopes. The site is long and narrow as dictated by the topography. The slopes are too steep to survey. A stand of Coulter pines (*Pinus coulteri*) have been planted on the east side. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and potential nesting habitat may be found in steep mountainous terrain surrounding the study area. However, currently condors rarely visit this general area. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may

consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in Pacoima Wash, approximately 1.5 miles to the southeast of Site LACFCP09; this drainage is also considered as potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) by the Angeles National Forest. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Site LACFCP08 is not hydrologically connected to Pacoima Wash. Surveys for Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS1B.2) were conducted in and around the accessible portion of the project area; adjacent slopes were too steep to conduct a botanical survey. Habitat in the project area is considered minimally suitable due to dense vegetation; no additional surveys are planned. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs and California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measurable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Contract Point Natural Landscape Block which overlaps the ranges of approximately 268 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area Contract Point - Santa Susanna Mountains that connects the San Gabriel Mountains West and Santa Susanna Mountains Natural Landscape Block. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. This project is located within the Angeles National Forest and environmental documents would consider forest sensitive species. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: Yes

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are two historical resources within the direct and indirect areas of potential effects (APEs). The two resources are P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. In addition, Forest Service Resource No. 05015500237 is within both the direct and indirect APEs at this project location. This resource consists of three separate loci of the Los Pinetos Nike Missile Site, which was constructed 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures), the radar control facility, and the launch control facility. The direct APE is completely encompassed by one of the Nike missile loci and the remaining two are approximately 1,500 to the east and west. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the National Register of Historic Places. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. The construction of these proposed facilities would directly and adversely affect the identified resources within the direct APE and adversely affect the Nike missile landscape. The condition and status of

cultural resources at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Activities at this project site would have a direct effect from ground disturbance and indirect (visual) adverse effect from erection of an out of character element into the Nike landscape. Given the magnitude of the project and the extent of the resources present at this project site impacts would be significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels; therefore, impacts would be unavoidable and significant.

Mitigation Measure(s):

None required for Resource No. P-19-186535. With implementation of CUL MMs 2, 3, and 5 for Forest Service Resource No. 05015500237, impacts would be minimized through archaeological monitoring for subsurface historical artifacts and through camouflage to disguise the proposed monopole; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels. Because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are two historical resources within the direct and indirect areas of potential effects (APEs). The two resources are P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. In addition, Forest Service Resource No. 05015500237 is within both the direct and indirect APEs at this project location. This resource consists of three separate loci of the Los Pinetos Nike Missile Site, which was constructed 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures), the radar control facility, and the launch control facility. The direct APE is completely encompassed by one of the Nike missile loci and the remaining two are approximately 1,500 to the east and west. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the National Register of Historic Places. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. The construction of these proposed facilities would directly and adversely affect the identified resources within the direct APE and adversely affect the Nike missile landscape. The condition and status of cultural resources at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the magnitude of the project and the extent of the resources present at this project site impacts would be significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels; therefore, impacts would be unavoidable and significant.

Mitigation Measure(s):

None required for Resource No. P-19-186535. CUL MMs 2 and 3 would be implemented for Forest Service Resource No. 05015500237; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels. Therefore, impacts at this Project site would be significant and unavoidable.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate to high pending geotechnical analysis

Soil Type: Pismo-Etsel family-Cieneba-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for

this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a somewhat excessively drained gravelly sand material. This soil type exhibits a rapid runoff with rapid permeability. Moderate to steep slopes surround the flat site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. The potential erosive properties of this soil type would be confirmed during geotechnical investigation and the results must be considered as part of the overall site design. Site design and construction would be required to conform to the current California Building Code (CBC), local building codes, and existing General Plan policies to ensure the site and its elements would be designed to minimize soil erosion.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LACFCP09 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LACFCP09 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LACFCP09. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LACFCP09 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LACFCP09, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LACFCP09 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Backcountry

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry. Backcountry includes areas of the national forest that are generally undeveloped with few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already developed and is not on land specifically designated for recreation, such as a campground or trailhead. Site LACFCP09, County CP 9, is not identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 2.91

Disaster Route: Sand Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 2.91

Nearest Major Arterial: Little Tujunga Canyon Rd

Distance (Miles): 1.13

Access to the Project Site Provided Via: Forest Route 3N17

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None Required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None Required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None Required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None Required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Sunshine Canyon City/County Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LACFCP11

Site Name: County CP 11

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Proposed construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 300 foot overhead electrical telecommunications line to existing utility pole. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 8800 W Soledad Canyon Rd

City: Santa Clarita

State: CA

Zip: 91350

Latitude: 34.4378761646

Longitude: -118.288361344

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: County Fire Camp

Existing Ground Elevation (feet AMSL): 2178

LACFCP11 Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



LACFCP11

County CP 11
8800 W. Soledad Canyon Rd.
Unincorporated, CA 93510

Proposed New Site Coordinates (NAD83):

Latitude: 34.437999
Longitude: -118.288309
Elevation (Feet): 2246

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in Angeles National Forest on a hilltop above Soledad Canyon Road, a paved 2-lane road paralleling a riparian area that provides access to recreational destinations such as campgrounds. A beige water tank approximately 20 feet tall currently exists on the site, set among low chaparral vegetation. A wide driveway accesses the site from the side of the hill opposite the road. A wide, cleared gravel area leads from the water tank to the helipad. The site is occasionally visible from westbound Soledad Canyon Road, but high cliffs block views for eastbound traffic. The high ridgeline, cut slope, and riparian corridor dominate the views. A heliport is located on the ridge adjacent to a water tank. Primary sensitive viewers are ANF visitors. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Developed Area (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Developed Area

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The hilltop at this site is lower than surrounding peaks and ridgelines. Both the new equipment shelter and monopole would be located in a previously cleared area beside the existing 20-foot tall water tank. The new facilities would be only intermittently visible from Soledad Canyon Road, where adjacent telephone poles present an existing human-made visual intrusion. The slender girth of the proposed monopole and its location on a lower hilltop beside the water tank would minimize impacts to scenic vistas. Both the new equipment shelter and monopole would be located in a previously cleared area beside the water tank. The water tank would block views of the shelter from the road. The facilities would be only intermittently visible from Soledad Canyon Road. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical, and this area is also identified as a Developed Area zone. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, and recreation and non-recreation special-uses facilities. This zone is the lowest designation for naturalness. The site is already impacted by the presence of the water tower and helicopters using the helipad. The new facilities would be compatible with the existing site and would not alter the area's visual character or quality, and there would be no change to the scenic attractiveness rating. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 2113

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Less than Significant

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LACFCP11. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LACFCP11 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site LACFCP11 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LACFCP11 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LACFCP11 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LACFCP11 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LACFCP11, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LACFCP11, which is 2,113 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 13 are higher than the SCAQMD thresholds except for PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site ZHQ and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LACFCP11 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LACFCP11 and all proposed Projects sites

would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); Santa Ana sucker (*Catostomus santaanae*; ESA-T, CDFW-SSC); unarmored three-spined stickleback (*Gasterosteus aculeatus williamsoni*; ESA-E, CA-E)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern California Three-spined Stickleback Stream; Southern Cottonwood Willow Riparian Forest; Southern Riparian Scrub; Southern Sycamore Alder Riparian Woodland; arroyo toad critical habitat (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); southwestern willow flycatcher (*Empidonax traillii extimus*; ESA-E, CA-E); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC); unarmored three-spined stickleback (*Gasterosteus aculeatus williamsoni*; ESA-E, CA-E);

Designated Critical Habitat Within 500 Feet:

arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

Yes

Indicators of Waters of the US Within 500 Feet:

No

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA – Santa Clara River; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - San Gabriel Mountains West - San Francisquito

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Ceanothus crassifolius*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LACFCP11 is at a Los Angeles County detention center in association with an existing water tank and helipad located at the end of a ridgeline, above and adjacent to Soledad Canyon Road. The Santa Clara River is on the opposite side of Soledad Canyon Road; Maher Canyon drainage passes through the detention facility, crosses under Soledad Canyon Road, and joins the Santa Clara River; both drainages are ephemeral within the project

area. Primary vegetation surrounding the project site is chamise chaparral; within the Santa Clara river corridor and Maher Canyon drainage within the project area is mature riparian forest that includes coast live oak and California sycamore trees. Although riparian forest is within the project area it would not be impacted by project activities that are separated from the Santa Clara River by Soledad Canyon Road. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP). However, the project site is located among the lower hills rather than on the peaks of surrounding mountains or ridgelines where condors may be attracted to a potential perch site; and the site is within an extensive developed facility with frequent human activity. Condors may fly over the site and study area, but are not expected to approach the project site. Though the project site is on a ridgeline within chaparral vegetation community, the Santa Clara River, on the opposite side of Soledad Canyon Road, is included within the study area. Within the river corridor is mature riparian vegetation, though the stream is not perennial in this portion of the drainage. The river corridor has been highly impacted by heavy equipment, dumping or storage of construction materials, active railroad, and as a source of water for helicopter bucket dips from a maintained water storage tank. It is unknown if southwestern willow flycatchers currently utilize the riparian corridor near Site LACFCP11; there are past records of flycatchers nesting farther downstream. The habitat is less than ideal with the lack of permanent or semi-permanent water, and lack of large patches of dense riparian vegetation with complex vertical structure (though habitat quality may change year to year). Though due to a lack of sufficiently dense riparian vegetation flycatchers would not be expected to nest along Maher Canyon, an ephemeral drainage that passes through the detention facility, if birds are present along the Santa Clara River, they may forage or disperse within Maher Canyon. Temporary disturbance to nesting, foraging, or dispersing flycatchers, if present. No riparian vegetation would be impacted by project activities; there would be no loss of flycatcher habitat. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur within the project area and individuals could be killed by project activities. Habitat for the two fish species, Santa Ana sucker (*Catostomus santaanae*; ESA-T, CDFW-SSC) and unarmored three-spined stickleback (*Gasterosteus aculeatus williamsoni*; ESA-E, CA-E), does not occur in the project area due to the ephemeral nature of the river system. Critical habitat for arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC) includes the Santa Clara River and the lower section of Maher Canyon, completely overlapping the project site. Primary constituent elements of critical habitat includes the stream and its hydrologic regime; channel, riparian and adjacent upland habitats; natural flooding regimes; and stream channel and adjacent upland habitats to allow for movements and dispersal. Most project-related activities are within previous development facilities, specifically excluded as critical habitat; however, project activities may impact native upland vegetation on the opposite side of Soledad Canyon Road from the Santa Clara River. No project activities would impact riparian habitats. Project-related construction activities and travel on access roads could impact dispersing toads, if present. The Santa Clara River in the vicinity of Site LACFCP11 is not perennial, though the unarmored three-spine stickleback (*Gasterosteus aculeatus williamsoni*; ESA-E, CA-E) may recolonize previously dry portions of the stream during wet periods. Based on records in the CNDDDB, stickleback presence in the river is more reliable about 1 mile downstream. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC) and its critical habitat, and the coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Do not remove riparian trees. Stay on existing roads. To protect dispersing arroyo toads, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Though no aquatic, wetland, or riparian habitat would be removed due to project activities, the project site is in close proximity to the Santa Clara River. Application of standard best management practices for control of sedimentation and spills would protect aquatic habitats of the unarmored three-spined stickleback (*Gasterosteus aculeatus williamsoni*; ESA-E, CA-E). Preconstruction surveys for nesting birds (including southwestern willow flycatcher) will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will

be established to protect nesting birds and active bird nests. • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 15 Southwestern Willow Flycatcher Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Riparian and ephemeral stream habitats are found in association with the Santa Clara River and the tributary drainage in Maher Canyon within 500 feet of the project site and within designated critical habitat for arroyo toad (*Anaxyrus californicus*; ESA-E, ESA-CH, CDFW-SSC). Mature riparian forest includes coast live oak and California sycamore trees. Southern California Three-spined Stickleback Stream, Southern Cottonwood Willow Riparian Forest, Southern Riparian Scrub, and Southern Sycamore Alder Riparian Woodland were not observed in the project area.

Mitigation Measure(s):

Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature. However, construction activities would be limited to the project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Contract Point Natural Landscape Block which overlaps the ranges of approximately 268 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area San Gabriel Mountains West - San Francisquito that connects San Gabriel Mountains through

Soledad Canyon Northwest to Liebre/Sawmill Mountains. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The entire southern one-half of this project location (including a portion of the direct APE) is encompassed by this California Landmark. The condition and status of cultural resources at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian granitic rocks, unit 2, (San Gabriel Mountains Anorthosite)

Stability: Moderate to high pending geotechnical analysis

Soil Type: Pismo-Etsel family-Cieneba-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed building site is flat grade on ridgetop surrounded by moderate to steep slopes.

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line was identified approximately 1 mile north of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes

specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a somewhat excessively drained gravelly sand material. This soil type exhibits a rapid runoff with rapid permeability. Moderate to steep slopes surround the flat site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. The potential erosive properties of this soil type would be confirmed during geotechnical investigation and the results must be considered as part of the overall site design. Site design and construction would be required to conform to the current California Building Code (CBC), local building codes, and existing General Plan policies to ensure the site and its elements would be designed to minimize soil erosion.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LACFCP11 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LACFCP11 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LACFCP11. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LACFCP11 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LACFCP11, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LACFCP11 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Camp 11 Heliport

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed, Heavy Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the vicinity (approximately 2 miles) of a private airstrip (Camp 11 Heliport), but outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as LACFCP11, this combined baseline noise level in combination with the estimated construction noise levels for this proposed Project site would be below the 90-Dba threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, this site will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: Yes

Trail Name: Located within 0.25 miles of Santa Clara River Trail

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Within Angeles National Forest

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site already supports a storage tank and is not on land specifically designated for recreation, such as a campground or trailhead. Site LACFCP11, County CP 11, is not identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Antelope Valley Frwy

Distance (Miles): 2.71

Disaster Route: Soledad Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 300 feet from Camp 11 Heliport and approximately 4.6 miles from Agua Dulce Airport

Nearest Highway/Freeway: Antelope Valley Frwy

Distance (Miles): 2.71

Nearest Major Arterial: Soledad Canyon Rd

Distance (Miles): 0

Access to the Project Site Provided Via: extension off of Soledad Canyon Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LACFCP11 is approximately 300 feet from Camp 11 Heliport and approximately 4.6 miles from Agua Dulce Airport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 70-foot-tall monopole with up to a 15-foot lightning rod), the TOWAIR tool indicates that the antenna structure is a "pass slope determination," which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Antelope Valley Recycling and Disposal Facility

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LARICSHQ

Site Name: LA-RICS Headquarters Building

Site Discussion:

Propose installation of up to 20 whip and up to 7 microwave antennas on roof top of existing building . Mount proposed 3-foot lightning rod to existing mounting platform which would not exceed 10% of the overall current structural height including appurtenances. Propose indoor equipment racks to be located in room in existing building.

Address: 2525 Corporate Place

City: Monterey Park

State: CA

Zip: 91754

Latitude: 34.047

Longitude: -118.1636

Jurisdiction: City of Monterey Park

Landowner: East Group Properties

Proposed LMR Facilities

Antenna Support Structure: Rooftop

New Support Structure Height: N/A

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

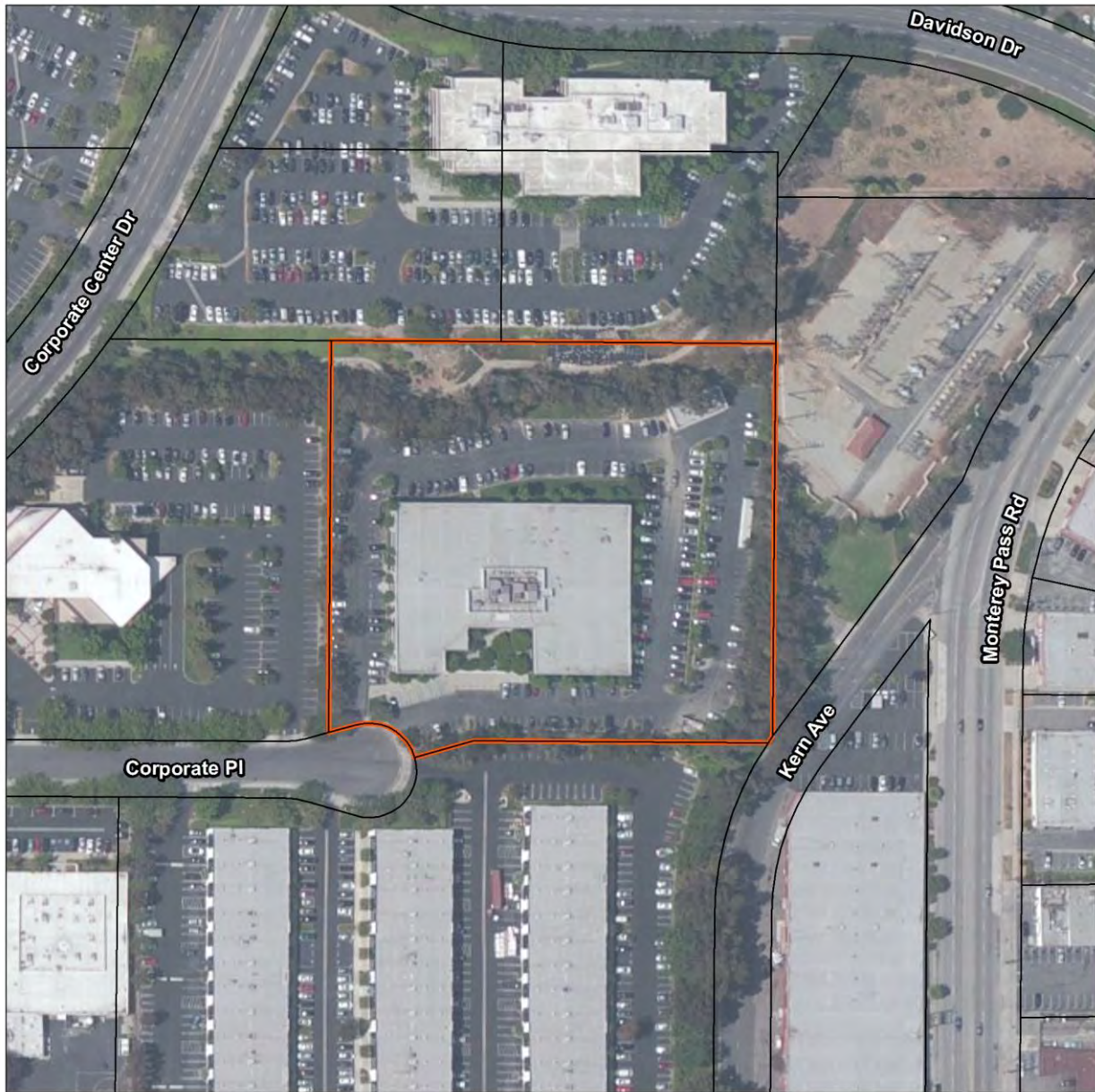
Existing Tower Type: N/A

Existing Tower Height: N/A

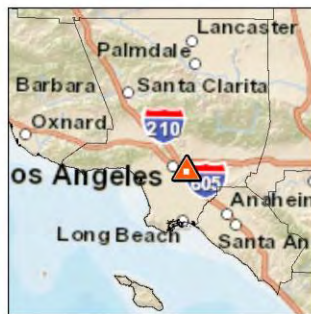
Existing Site Use: Commercial Building

Existing Ground Elevation (feet AMSL): 340

LARICSHQ Site Boundary Map



- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



LARICSHQ

LA-RICS Headquarters Building
 2525 Corporate Place
 Monterey Park, CA 91754

Proposed New Site Coordinates (NAD83):

Latitude: 34.047238

Longitude: -118.163421

Elevation (Feet): 350

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located within a fully developed urban area at the LA -RICS headquarters building within an office complex. The building is a two-story beige and white building. The area immediately surrounding the headquarters building consists of similarly-colored two-story office and commercial buildings and associated paved parking lots. Street lighting and building signage are located along the roads with the office park. A notable characteristic of the area is the mature commercial landscaping, including trees and shrubs, located adjacent to the office buildings and lining the streets. Most trees are taller than the office/commercial buildings and serve to partially screen views of the buildings both from inside the office complex itself and from adjacent commercial/industrial areas. A power substation is located immediately northeast of the headquarters building parking lot.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a suburban/industrial setting. The proposed new facilities would not be located in an area defined as a scenic vista.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed new facilities would not affect the existing visual character and quality, which is low, consisting primarily of adjacent commercial and industrial uses. The new facilities would be compatible in height to the telephone poles and palm trees that comprise the primary vertical elements in the area.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site is located in an urban area. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Office Building

Distance to Sensitive Receptor: 65

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LARICSHQ. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LARICSHQ or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Emissions from the construction of proposed site LARICSHQ would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LARICSHQ will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LARICSHQ would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LARICSHQ or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LARICSHQ, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LARICSHQ, which is 65 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 11 are higher than the SCAQMD threshold for CO and lower for NO_x, PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LARICSHQ and were not assessed further.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LARICSHQ in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LARICSHQ and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American badger (*Taxidea taxus*; CDFW-SSC); bank swallow (*Riparia riparia*; CA-T); burrowing owl (*Athene cunicularia*; CDFW-SSC); southwestern willow flycatcher (*Empidonax traillii extimus*; ESA-E, CA-E); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:**Wildlife Corridor or Nursery Site:**

None

Local Policy or Ordinance for Biological Resources:

City of Monterey Park General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamental

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LARICSHQ is located within a completely urbanized area. No native habitats are present; no special status species would occur within the project area. Roof-top mount.

Mitigation Measure(s):

None required.

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Monterrey Park does not contain open space or natural vegetation according to the General Plan. Conservation issues are limited to recreation in parks.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Monterey Park General Plan does not include policies to protect biological resources.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). The direct APE consists solely of the LA-RICS Headquarters building, which was built in 1986 and, based on archival research and field survey, is not a historical resource. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APE). The direct APE consists solely of the LA-RICS Headquarters building, which was built in 1986 and is surrounded by pavement. Based on archival research and field survey, there are no historical resources (archaeological) within

the 0.5 mile radius of the project site. Based on the absence of historical resources (archeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as high sensitivity at the surface and subsurface for the Fernando Formation. However, these deposits overlie older alluvium, which has a moderate/unknown potential for significant vertebrate fossils. No localities are recorded within the proposed site. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Periodic paleontological spot checks are required during excavation into the artificial fill to determine if Fernando Formation is present. If present, monitoring would be conducted during excavation into paleontologically sensitive sediments to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted and a search of their sacred land file requested. A response from the NAHC indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Pliocene marine rocks

Stability: Low to moderate. Not located in a liquefaction zone or landslide area.

Soil Type: Urban land-Lithic Xerorthents-Hambright-Castaic Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: Located 80 FT west of a liquefaction zone

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line was identified approximately 0.3 miles south of the property, but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or other geologic hazards would be less

than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site has a mix of shallow, well drained stony loam to silty clay loam. This soil type exhibits a medium to very rapid runoff with moderately slow permeability, resulting in moderate erosion resistance. Moderate slopes surround the site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. There would be no ground disturbing activities associated with the operation of the LMR facility.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no impact on the project. The site is located in an urban area and antenna are to be located on the roof of existing building. No new structures would be built to support the antenna. Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards, such as land spreading prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or other geologic hazards would be no impact for construction and operational impacts.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LARICSHQ and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LARICSHQ was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LARICSHQ. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LARICSHQ would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LARICSHQ, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LARICSHQ would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: Yes, East Los Angeles Academy

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR Site is within 1/4 mile of 2 permitted USTs and 1 open LUST

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: Yes

If yes, please explain: Blanchard Street Dump

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

East Los Angeles Academy is located within 0.25 mile of the proposed Project site. Construction activities could include refueling of equipment on site, which would be done using the BMPs identified in Chapter 2. Operations could include transport to and refueling of the up to 1500 gallon diesel tank integrated into the generator proposed for the site. Use, transport, and disposal of hazardous materials and wastes are required to occur in compliance with federal, state, and local regulations.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Coastal Plain Of Los Angeles

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting

process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Monterey Park and Unincorporated

General Plan Designation: Commercial

Zoning: Commercial and Services

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Wireless Telecommunications Facility Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: West San Gabriel Valley Planning Area and Metro Planning Area

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing building and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Monterey Park

Applicable Noise Ordinance: Title 9 Peace, Safety, and Morals, Chapter 9.53 Noise

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays and 6pm to 9am on weekends and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient

noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Interstate 710

Distance (Miles): 0.1

Disaster Route: Interstate 710

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 4,000 feet from Los Angeles County Sheriff's Department Heliport; no airports within 5 miles

Nearest Highway/Freeway: Interstate 710

Distance (Miles): 0.2

Nearest Major Arterial: Cesar E Chavez Avenue

Distance (Miles): 0.4

Access to the Project Site Provided Via: Corporate Place

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LARICSHQ is located approximately 4,000 feet from Los Angeles County Sheriff's Department Heliport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered for Site LARICSHQ, the TOWAIR tool indicates that the antenna structure meets the 6.10-meter (20-foot) rule criteria. This means that FAA notification is not required if the antenna structure is 6.10 meters (20 feet) or less in height, unless the antenna structure would increase the height of another antenna structure. The tallest proposed features are a 15-foot whip antenna so no impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Scholl Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: City of Monterey Park Water System

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LEPS

Site Name: Lower Encinal Pump Station

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Intersection of Camino De Buena Ventura and Avenida De La Encinal

City: Malibu

State: CA

Zip: 90265

Latitude: 34.04573718

Longitude: -118.889654712

Jurisdiction:

Landowner: Matilla Partners Limited

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A

Existing Tower Height: N/A

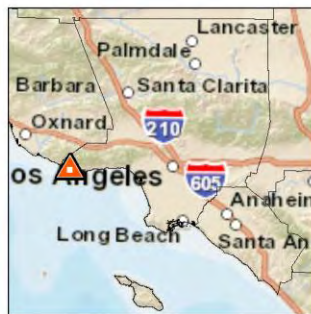
Existing Site Use: Water Tank

Existing Ground Elevation (feet AMSL): 519

LEPS Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



LEPS

Lower Encinal Pump Station
Camino De Buena Ventura and Avenida De La Encinal
Malibu, CA 90265

Proposed New Site Coordinates (NAD83):
Latitude: 34.045717
Longitude: -118.889589
Elevation (Feet): 509

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in the coastal zone approximately 0.5 mile from the coast in a low-density estate house neighborhood adjacent to and just north of Encinal Canyon Road. The site is adjacent to a water tank among very hilly topography consisting primarily of low shrub vegetation with scattered taller evergreens. Vegetative cover is chaparral and oak woodlands; patches of grasslands and pine exist. Telephone poles line nearby streets. The site is not currently visible from Encinal Canyon Road. Primary sensitive viewers are people traveling Encinal Canyon Road, which is designated as a Scenic Road by the City of Malibu, which defines scenic roads as existing public roads with views of the ocean and other scenic areas (City of Malibu 2002).

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, City of Malibu Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Encinal Canyon Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be located adjacent to a water tank, which is not currently visible from Encinal Canyon Road. The top of the monopole would be visible from the road as it is likely taller than the water tank, but would be above the drivers' viewing angle when viewed from the south. As the road then travels directly east for nearly one mile and then north, the site would no longer be visible from the road. The new facilities would be visible from certain view points in the area, particularly those north of the site toward the ocean. The greatly varying topography would obscure some views of the site depending on the location. The relatively low height and narrow girth of the structure would make it difficult to see from more distant viewing locations, and the facilities would be below the viewing plane in many instances. Ongoing and recurring maintenance activities would be infrequent and would not substantially affect scenic vistas. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Very little vegetation exists on site, the majority of which has been previously cleared. No rock outcroppings, historic buildings, or other scenic resources exist in the area. The same construction activities described for scenic vistas, described above, would also apply. Minimal damage to vegetation or other elements that would be considered scenic resources would occur during construction.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by grading and the presence of a water tower. The new monopole and associated equipment would be compatible with the existing site, and – to a lesser extent -- with the surrounding landscape, which is a low-density suburban area. Due to its relatively small stature, the monopole would blend into the surroundings. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 310

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LEPS. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LEPS or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site LEPS would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LEPS will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LEPS would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LEPS or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LEPS, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LEPS, which is 310 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, lower for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LEPS and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LEPS in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LEPS and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

Santa Susana tarplant (*Deinandra minthornii*; CA-R, CNPS-1B.2); Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; CNPS-2B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; groundfish (M&F-EFH)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, CDFW-SCC); monarch butterfly (*Danaus plexippus*; ESA-Pet); Southern Coast Live Oak Riparian Forest; Santa Susana tarplant (*Deinandra minthornii*; CA-R, CNPS-1B.2); Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; CNPS-2B.2)

Designated Critical Habitat Within 500 Feet:

Riparian Habitat Within 500 Feet:

Yes

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS)

Local Policy or Ordinance for Biological Resources:

City of Malibu Local Coastal Program

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Laurel sumac scrub [*Malosma laurina* Shrubland Alliance]; Association - *Malosma laurina* shrubland(semi-dense)-*Eriogonum fasciculatum* shrubland (Sparse).

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LEPS is located in the Santa Monica Mountains in association with an existing water tank in a fenced and paved compound that has been cut-back into the hillside resulting in an excavated disturbance zone of approximately 100 feet surrounding the water tank. Though coastal sage scrub vegetation is reestablishing in the disturbance zone, it appears the area is mowed as part of site maintenance. A few California walnut trees (*Juglans californica*) are adjacent to the project site. The surrounding vegetation within the project area is coastal sage scrub dominated by California sagebrush (*Artemisia californica*), purple sage (*Salvia leucophylla*), and California buckwheat (*Eriogonum fasciculatum*); on the opposite side of the paved Encinal Canyon Road is a shallow canyon with ephemeral drainage that supports riparian vegetation including California sycamore (*Platanus racemosa*),

coast live oak (*Quercus agrifolia*), and arroyo willow (*Salix lasiolepis*). The project area includes potential high quality habitat for coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, CDFW-SCC) within a more expansive area of coastal sage scrub vegetation with a low degree of habitat fragmentation. Protocol surveys for the gnatcatcher were conducted in 2014 and no birds were detected. Though this general area of Los Angeles County is not known to support high numbers of breeding gnatcatchers, the coastal sage scrub community is high quality gnatcatcher habitat, and so birds could colonize the project area at any time. If birds are present they could be impacted by project activities. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline approximately 0.5-miles of the project site; no project activities would impact marine environments. Monarch butterflies (*Danaus plexippus*; ESA-Pet) may pass through the project area and use the tall trees as roost sites. Santa Susana tarplant (*Deinandra minthornii*), SR, 1B.2) is a perennial but was not observed during the habitat assessment survey conducted 8/5/2014; potential habitat is present within coastal sage scrub vegetation. Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2) is a perennial and was not observed during the habitat assessment survey conducted 8/5/2014; potential habitat may be found in the study area within Encinal Canyon. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) and coastal California gnatcatchers (*Polioptila californica californica*; ESA-T, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; especially coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]). Conduct protocol surveys for the gnatcatcher; if nesting is present within the project area limit construction activities to the non-breeding season. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Manage trenches so as not to trap wildlife. Stay on existing roads. Conduct spring botanical surveys for Susana tarplant (*Deinandra minthornii*), SR, 1B.2) and Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 14 Coastal California Gnatcatcher Protocol Surveys • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Southern Coast Live Oak Riparian Forest occurs within the project area in a shallow canyon along an ephemeral drainage on the opposite side of the paved Lower Encinal Road; no project related activities would impact riparian habitat.

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and

Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site LEPS does not contain Environmentally Sensitive Habitat Areas (ESHAs), and the site is bounded on three sides by paved roads. ESHA does exist in the southern and western portions of the study area at Site LEPS. The City of Malibu Local Coastal Program (LCP) Land Use Plan (LUP) includes ESHA designations and protections for designated ESHA. The City of Malibu General Plan Conservation Element provides specific conservation policies. These include avoidance of consumption of ecologically sensitive lands (including ESHAs [CON Policies 1.1.1 and 1.2.4]), prioritization of protection of ESHA over development (CON Policy 1.1.4), protection of plants and wildlife (CON Policy 1.1.5), prevention of spread of invasive plants (CON Policy 1.2.5), discouragement of use of herbicides (CON Policy 1.2.7), and control of surface runoff (CON Policy 1.3.11). Impacts from construction and operations are described in BIO Impact 1 and Bio Impact 3. Because a potential for significant impact associated with the resources protected by the LCP LUP exists, a conflict with the policies contained in the LCP LUP exists and this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 coupled with application of LU MM 3 (requiring the Authority

obtain a coastal development permit) would reduce impacts to less than significant. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 Worker Environmental Awareness Program
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 16 Snowy Plover Instructions
- BIO MM 18 Nesting Bird Instructions
- BIO MM 24 Prevent the Spread of Nonnative Vegetation

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

Yes

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). Within the indirect APE there are seven previously recorded prehistoric archaeological sites that have been heavily disturbed from road construction, agricultural activities, modern development, and unauthorized artifact collection. One of the sites (P-19-000384 - approximately 1,700 feet from the direct APE) may have at one time contained human bone; however, no bone or other human remains have been reported from the other six sites. The closest of the seven sites to the direct APE is approximately 700 feet away. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a new backup generator and fuel tank on a concrete pad; none of which would have either a direct or visual effect on the archaeological sites within the indirect APE. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the distance of the identified resources from the project site, there would be no impacts on historical resources.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct area of potential effects (APEs); however, there are seven unevaluated archaeological sites identified within the indirect APE all of which are situated between 700 and 2,600 feet from the direct APE and would not be either directly or indirectly affected by LMR construction. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the distance of the identified resources from the project site, there would be no impacts on historical resources.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Topanga Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include smelt and herring. With implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within the direct area of potential effects (APEs). Human bone has been identified in one of the seven identified unevaluated archaeological sites within the indirect APE; however, this site is approximately 1,700 feet from the direct APE and well beyond the LMR construction area. Project activities, therefore, would not disturb any human remains; therefore, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct area of potential effects (APEs). Tribal resources have been identified within the indirect APE (within the seven identified archaeological sites); however, the seven sites are each greater than 850 feet from the direct APE and well beyond the LMR construction area. Project activities, therefore, would not disturb Tribal resources. The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

There would be no impacts at this project site; however, a monitor would be present during ground disturbing activities at the request of the Soboba Band of Luiseño Indians.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Sespe-Millsholm-Malibu-Lodo-Hambright Association

Erosion Potential: Moderate pending geotechnical analysis

Expansive Soil: Moderate potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: yes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line was identified approximately 1/3 mile south of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes

specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located in a deep cut pad adjacent to a water. All surface soils have been stripped away, and proposed location is on exposed bedrock, and compacted fill. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards natural and constructed drainage.

Mitigation Measure(s):

None Required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell

with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LEPS and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LEPS was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LEPS. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LEPS would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LEPS, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LEPS would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Project Site located in Very High Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Malibu Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Malibu

General Plan Designation: Rural Residential

Zoning: Rural Residential

What is the zoning height restriction, if any?:

28 feet

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Malibu

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 28 feet.

Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Malibu General Plan is not applicable and no conflict with the plan exists.

Site LEPS also is within the Malibu Coastal Zone and is located within 500 feet of Encinal Canyon Road, a Scenic Road, on a parcel that supports a storage tank within the City of Malibu Coastal Zone. The City of Malibu Coastal Zone Land Use Plan was certified by the California Coast Commission on September 13, 2002 and provides for communication facilities as a conditional use in all land use designations. Policies in the Land Use Plan include avoiding or minimizing impacts to Environmentally Sensitive Habitat Areas and scenic resources; avoiding facility visibility from public viewing areas; and co-locating facilities where feasible. Per Local Implementation Plan Policy 3.14.1, the general requirements for every wireless telecommunications facility and antenna include development standards specifying that the maximum height of ground or building-mounted antennae shall not exceed 28 feet. Per Land Use Plan Policy 6.5, new development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads to the maximum feasible extent. The proposal is to mount whip and microwave antennas on a proposed 70-foot-tall monopole at a site that currently does not include communications facilities.

Construction of the proposed project facilities at this site would result in a conflict with the City of Malibu Coastal Zone Land Use Plan because of exceeding the height requirements.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Malibu

Applicable Noise Ordinance: Municipal Code, Title 8 Health and Safety, Chapter 8.24 Noise

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays, before 8 a.m. or after 5 p.m. on Saturday, or any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 280 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: Scattered Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers within this distance to the site; therefore, groundborne vibrational noise impacts would be less than significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 280 feet from proposed sites would be 68 dBA and not exceed the 90 dBA daytime or 80 dBA nighttime criterion; therefore, construction impacts would be less than significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working

in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: City of Malibu Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles): 2.71

Disaster Route: Encinal Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Pacific Coast Hwy

Distance (Miles): 0.32

Nearest Major Arterial: Encinal Canyon Rd

Distance (Miles): 0.08

Access to the Project Site Provided Via: Vista Del Ventada

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST #29

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

•Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: LPC

Site Name: Loop Canyon

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest – off Forest Route 3N17

City: Santa Clarita

State: CA

Zip: 91350

Latitude: 34.3529499053

Longitude: -118.416918517

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

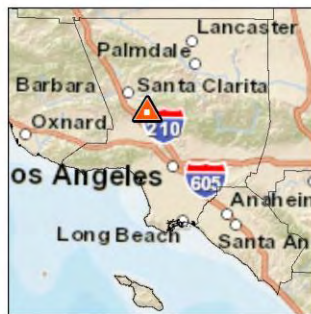
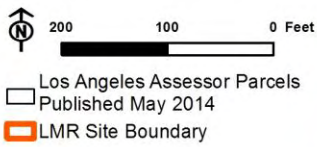
Existing Tower Type: Lattice (2)

Existing Tower Height: 124' each

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3866

LPC Site Boundary Map



LPC

Loop Canyon
 Angeles National Forest - 3N17.9 Santa Clara Divide
 Unincorporated, CA 91321

Proposed New Site Coordinates (NAD83):

Latitude: 34.35295
 Longitude: -118.416919
 Elevation (Feet): 4025

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest adjacent to Santa Clara Truck Trail on an undeveloped ridgetop at an elevation that is higher than surrounding hills. The site includes a large cleared area with a rectangular building, triangular paved parking area, and two low, broad platforms approximately two to three stories tall. Antennas of various sizes and shapes stand upon the platforms. Another building and two lattice towers of unknown height are located approximately 200 feet northeast of the site on the approach road. This site is visible from the Santa Clara Truck Trail and other nearby trails that climb to the ridgeline, but most views are toward the ocean, away from the site. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back Country

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing structures that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would attenuate the noticeability of new monopole. In addition, locating the new monopole and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area.

Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and structures of various size and configuration. Although the new monopole and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. No change to the designated scenic classification would occur. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare

that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 252

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site LPC. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site LPC or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site LPC would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site LPC will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site LPC would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site LPC or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site LPC, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site LPC, which is 252 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 13 are higher than the SCAQMD thresholds for NO_x, CO, lower for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LPC and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site LPC in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site LPC and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA – Santa Clara River; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Contract Point - Santa Susana Mountains; Natural Landscape Block – Contract Point;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Canyon live oak woodland [*Quercus chrysolepis* Shrubland Alliance]; Association - *Adenostoma fasciculatum* (Sparse)

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site LPC is located on a mountain ridge at 4,025 feet elevation in the San Gabriel Mountains within montane chaparral vegetation. Diagnostic woody vegetation includes interior live oak (*Quercus wislizenii*), squaw bush (*Rhus trilobata*), mountain mahogany (*Cercocarpus montanus*), deer vetch (*Acmispon glaber*), manzanita, chamise (*Adenostoma fasciculata*), and laurel sumac (*Malosma laurina*). The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP). Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several

communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these structures. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in Pacoima Wash, almost 2 miles to the southeast of Site LPC; this drainage is also considered as potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) by the Angeles National Forest. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Site LPC is not hydrologically connected to Pacoima Wash. Davidson's bush-mallow (*Malacothamnus davidsonii* 1B.2) was observed within the project area, adjacent to the project site. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E), California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC), and Davidson's bush-mallow (*Malacothamnus davidsonii* 1B.2) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs and California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Mark the areas requiring special protection for Davidson's bush-mallow. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site; however, Southern Coast Live Oak Riparian Forest was observed below the project site to the northwest at a distance of approximately 0.15-miles. Site LPC is hydrologically connected to stream habitats that include occupied habitat of the southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E), and potentially suitable habitat for the California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC).

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Contract Point Natural Landscape Block which overlaps the ranges of approximately 268 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area Contract Point - Santa Susanna Mountains that connects the Santa Susanna Mountains eastward to the San Gabriel Mountains through Contract Point. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual

species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: Yes

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of the two resources is P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. The second identified historical resource (Forest Service Resource No. 05015500237) consists of two of three separate loci of the Los Pinetos Nike Missile Site, which was constructed 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures) and the radar control facility; the third locus (the launch control facility) is situated just outside the southeast boundary of the indirect APE. The direct APE is completely encompassed by one of the Nike missile loci and the remaining two are approximately 1,650 to 2,900 feet to the east. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the National Register of Historic Places. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified

archaeologist and architectural historian in December 2014. The construction of the proposed facilities would directly and adversely affect the National Register-eligible Nike missile resources within the direct APE and adversely affect the Nike missile landscape within the indirect APE; therefore, impacts would be unavoidable and significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels.

Mitigation Measure(s):

None required for Resource No. P-19-186535. With implementation of CUL MMs 2, 3, and 5, impacts on Forest Service Resource No. 05015500237 would be minimized through archaeological monitoring for subsurface historical artifacts and through camouflage to disguise the proposed monopole; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, impacts would be significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels. Because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant and Unavoidable Impact

Indirect / Visual Impact: Significant and Unavoidable Impact

Discussion:

There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of the two resources is P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any associated resource features at this proposed project site, impacts would be less than significant. The second identified historical resource (Forest Service Resource No. 05015500237) consists of two of three separate loci of the Los Pinetos Nike Missile Site, which was constructed 1955-1956 and deactivated in 1968. The loci are the locations of the administrative area (barracks and support structures) and the radar control facility; the third locus (the launch control facility) is situated just outside the southeast boundary of the indirect APE. The direct APE is completely encompassed by one of the Nike missile loci and the remaining two are approximately 1,650 to 2,900 feet to the east. The complex of Nike facilities was formally evaluated in 1987 and determined eligible for inclusion in the National Register of Historic Places. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. The construction of the proposed facilities would directly and adversely affect the National Register-eligible Nike missile resources within the direct APE and adversely affect the Nike missile landscape within the indirect APE; therefore, impacts would be unavoidable and significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels.

Mitigation Measure(s):

None required for Resource No. P-19-186535. With implementation of CUL MMs 2 and 3, impacts on Forest Service Resource No. 05015500237 would be minimized through archaeological monitoring for subsurface historical artifacts; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, impacts would be significant and even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels. Because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Pismo-Etsel family-Cieneba-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line (San Gabriel Fault) was identified approximately 3/4 of a mile northwest of the property (EDR, 2014), but is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the

Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a somewhat excessively drained sandy to gravelly loam with moderately rapid to very rapid runoff and rapid permeability. Moderate to steep slopes surround the relatively flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site LPC and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site LPC was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site LPC. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LPC would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site LPC, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site LPC would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Pacoima Dam Helipad

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Backcountry

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry. Backcountry includes areas of the national forest that are generally undeveloped with few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Loop Canyon is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 1.01

Disaster Route: Sand Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 2.71

Nearest Major Arterial: Little Tujunga Canyon Rd

Distance (Miles): 1.41

Access to the Project Site Provided Via: Extension off of Forest Route 3N17

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Sunshine Canyon City/County Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: MMC

Site Name: Mount McDill

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Sierra Pelona West Mountainway

City: Palmdale

State: CA

Zip: 91390

Latitude: 34.5659242001

Longitude: -118.254784718

Jurisdiction:

Landowner: Lockheed Corporation

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice




Existing Tower Height: 100'; 60'

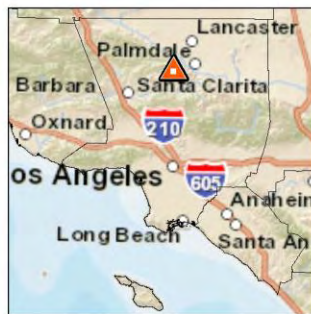
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5095

MMC Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



MMC

Mount McDill
Sierra Pelona W. Mountain Way
Palmdale, CA 91390

Proposed New Site Coordinates (NAD83):

Latitude: 34.565941
Longitude: -118.254846
Elevation (Feet): 5084

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is on an undeveloped ridgetop east, and outside, of the Angeles National Forest Santa Clara District. One 100-foot high lattice tower and one 60-foot high lattice tower, both with several microwave dishes, are located within a small square concrete pad enclosed with chain link fence. Small, one-story high shelters and small equipment (e.g., generator and HVAC unit) are also on site. The surrounding landscape is an undeveloped rural area along a dirt Forest Service Road. Little vegetation exists, except for scattered trees north and northwest of the site. The remaining area is predominantly barren.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing structures that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would attenuate the noticeability of new tower. In addition, locating the new monopole and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and two lattice towers. Although the new tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required

Air Quality

Setting

Air Basin: Mojave Desert

Air Quality Management District: Antelope Valley

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM10 (unclassified)

State Nonattainment Status: O3, PM10, PM2.5 (unclassified)

Applicable Air Quality Management Plan(s):

AVAQMD 2004 Ozone Attainment Plan (State and Federal), AVAQMD Federal 8-Hour Ozone Attainment Plan, AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to H&S Code 39614(d), AVAQMD CEQA and Federal Conformity Guidelines

Significance Thresholds:

General Conformity (tons/year): CO (100), NOX, VOC (25); Local construction and operation (tons/year): CO (100), NOX, VOC (25), PM2.5, PM10 (15); Local construction and operation (lbs./day): CO (548), NOX, VOC (137), PM2.5, PM10 (82)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 1348

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMD air quality plans considered in this analysis include the AVAQMD 2004 Ozone Attainment Plan (State and Federal) (AVAQMD 2004 Ozone Plan) (AVAQMD 2004). The purpose of this plan was to (1) demonstrate that the AVAQMD would meet the primary O3 NAAQS by the end of 2007; (2) present progress by the AVAQMD toward meeting all state planning milestones including attainment of the O3 CAAQS; and (3) discuss the 8-hour O3 NAAQS in preparation for a new nonattainment designation under a revised standard. Also considered in this analysis of Project air quality impacts is the AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area) (AVAQMD 8-Hour Ozone Plan) (AVAQMD 2008). The purpose of this plan is to (1) demonstrate that the AVAQMD will attain the primary O3 NAAQS by June 2021; (2) present progress by the AVAQMD toward meeting all required O3 planning milestones and NAAQS and CAAQS; and (3) discuss the newest 0.075 ppm O3 NAAQS in anticipation of a nonattainment designation for this revised standard.

Finally, the analysis considered the AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to Health and Safety Code 39614(d) (AVAQMD PM Measures Plan) (AVAQMD 2005). The purpose of this plan is for the AVAQMD to develop a list of Best Available Control Technologies (BACT) either currently being implemented or for future consideration to control particulate emissions within the district.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site MMC. The analysis indicates that emissions from the construction of all the proposed Project sites located in the MDAB including site MMC would not exceed AVAQMD significance thresholds for the listed criteria pollutants including O3 precursor Nox. Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for any criteria pollutants including O3 precursor Nox and particulate matter. Therefore, the Project would not conflict with or obstruct implementation of the

AVAQMD 2004 Ozone Plan, AVAQMD 8-Hour Ozone Plan, or the AVAQMD PM Measures Plan. Impacts of the proposed Project on the implementation of the AVAQMD plans would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Emissions from the construction from proposed LMR Site FRP or emissions from the simultaneous construction of the three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for criteria pollutants. Per AVAQMD guidance, compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; therefore, Project construction impacts in the MDAB would be less than significant.

Operational emissions of the proposed LMR Site FRP or the operational emissions of all Project sites in the MDAB are less than significant and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, Project operational impacts would be less than significant in the MDAB.

Mitigation Measure(s):

No mitigation measures are required.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O₃ and PM₁₀ (CAAQS) in the MDAB. Cumulatively considerable net increases in these pollutants were examined relative to the AVAQMD significance thresholds for each.

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O₃ and PM₁₀ (CAAQS) in the MDAB. Cumulatively considerable net increases in these pollutants were examined relative to the SCAQMD significance thresholds for each.

Mitigation Measure(s):

No mitigation measures are required.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMD considers residences, schools, daycare centers, playgrounds and medical facilities to be sensitive receptor land uses. Exposure of sensitive receptors to substantial pollutant concentrations as defined above in Chapter 3.2.3.1, Criterion 4 is required for the following project types: (1) any industrial project within 1,000 feet; (2) a distribution center (40 or more trucks per day) within 1,000 feet; (3) a major transportation project (50,000 or more vehicles per day) within 1,000 feet; (4) a dry cleaner using perchlorethylene within 500 feet; and (5) a

gasoline dispensing facility within 300 feet. While the Project as proposed does not fall within one of these project types; the analysis of sites within the MDAB includes a qualitative assessment of pollutants that impact human health.

The use of off-road heavy-duty diesel equipment by the Project for demolition, site grading and excavation, and concrete pad construction activities would result in the generation of diesel particulates (DPM) emissions. DPM were identified as a toxic air contaminant (TAC) by CARB in 1998. Other potential TAC sources associated with construction include the demolition of asbestos-containing materials and the excavation of naturally occurring asbestos (NOA) in soils. The monthly one hour test of the backup generator at each proposed Project site, including site MMC would generate DPM emissions. Emergency operation of the backup generators, which is anticipated to have a 200 hour continuous operational capacity would also generate DPM emissions. No other operational sources of these or other TACs would occur.

According to the Consolidated Table of Office of Environmental Health Hazard Assessment (OEHHA)/ CARB Approved Risk Assessment Health Values, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SCAQMD, 2015; SMAQMD, 2014); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA, 2015). As discussed in Appendix B, the maximum construction activity scenario assumed at site MMC and all proposed sites would have a six week duration. Similarly, the duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project construction and operation is not warranted.

Demolition of existing structures at proposed sites in the MDAB would be subject to AVAQMD Rule 1403. Rule 1403 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires lead agencies and their contractors to notify the District of any regulated renovation or demolition activity. By complying with District Rule 1403, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the MDAB, including site MMC, would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per AVAQMD guidance (AVAQMD 2011), compliance with the criteria pollutant significance thresholds and the health risk based significance threshold established by AVAQMD Criterion 4 is sufficient to demonstrate that construction and operation of the proposed Project sites in the MDAB, including site MMC, would not result in sensitive receptor exposure to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to

generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site FRP and all proposed Project sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to AVAQMD Rule 402. In addition, the operation of all Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to AVAQMD Rule 402; therefore, Project impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

Wildlife Linkage – San Gabriels – Tehachapis (Missing Link)

Local Policy or Ordinance for Biological Resources:

City of Palmdale General Plan

Applicable HCP or NCCP:

West Mojave Plan

Dominant Vegetation Community:

Cheatgrass grassland [*Bromus tectorum* Semi-Natural Herbaceous Stands];

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site MMC is located on a mountain top in the San Gabriel Mountains. The vegetation recently burned and the project area contains mostly cheat grass. The project area was probably dominated by scrub oak in the past. Seedlings of bush buckwheat (*Eriogonum fasciculatum*), rubber rabbitbrush (*Chrysothamnus nauseosus*), ceanothus, poodle plant (*Turricula parryi*), and scrub oak (*Quercus berberidifolius*) were observed. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP). Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these structures. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur on-site and individuals could be killed by project activities. No sensitive plant species were observed or expected at the site. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could

occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 WEAP
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 6 Anti-perch Devices
- BIO MM 7 California Condor Protection
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 18 Nesting Bird Protection
- BIO MM 19 Trenches and Holes Management

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The city of Palmdale does have ordinances about preservation of desert vegetation primarily Joshua trees and junipers. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Palmdale General Plan has policies that protect biological resources. Policy ER-2.1.1 calls for protection of SEAs, but none coincide with MMC. Policy ER-2.1.5 calls for preservation and maintenance of significant Joshua tree woodlands and other significant habitat areas. These do not occur on site. Policy ER-2.2.1 calls for the city to participate in implementation of the WEMO, specifically citing protection of desert tortoise and Mohave ground squirrel. These do not have the potential to occur on site. WEMO, to which Palmdale is a signator, includes protection measures associated with several other species, including conditional measures for Mohave ground squirrel, burrowing owl, ferruginous hawk, prairie falcon, southwestern pond turtle, and short-joint beavertail cactus. Additional information regarding WEMO is provided in the discussion of Impact BIO-6, below. Specific resources that may be protected by the plan that occur on site are discussed in BIO Impact 1. Only limited potential exists to impact individual resources protected by the City of Palmdale General Plan exists. The Authority is exercising intergovernmental immunity, therefore the plan is not applicable and no conflict with the City of Palmdale General Plan exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The primary goal of the West Mojave Plan (WEMO) is to protect and manage over 100 listed or sensitive species and puts special emphasis on the desert tortoise and the Mohave ground squirrel. Plan objectives include protecting large habitat blocks, avoiding human impacts on conservation areas, considering habitat specialists in conservation efforts, maintaining biodiversity, and providing a streamlined process for incidental take permits. Site MMC is in the WEMO planning area, specifically within the City of Palmdale. Protections afforded biological resources within the City of Palmdale, a signatory to the WEMO, include conservation measures for several species. Many of these measures are activity-specific (i.e., construction of electrical transmission lines). None of the species protected in the WEMO are known to occur at Site MMC. No conflicts associated with proposed construction or operations activities have been identified and no impacts are anticipated.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: Yes

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in November 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). Artifacts associated with these sites have been previously collected and the data recorded (see CULT-1). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Schist of various types and ages, unit 2 (Southern and West-central California)

Stability: Moderate to High pending geotechnical analysis

Soil Type: Sobrante-Lodo Association

Erosion Potential: Low

Expansive Soil: Low to moderate pending geotechnical analysis

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained silt to shaly clay loam with low to very high runoff and moderate permeability. Low angle to moderate slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Palmdale planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: Mojave Desert

Air Quality Management District: Antelope Valley

AQMD Significance Threshold: 100,000 tons CO₂eq/year (548,000 lbs. daily), 25,000 metric tons (MT) CO₂equivalent(eq)/year amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

Executive Orders S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, Senate Bill 97, AVAQMD CEQA and Federal Conformity Guidelines, Rule 3011 GHG Provisions of Federal Operating Permits

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site MMC and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the three (3) proposed Project sites in the MDAB. The generator test would last one hour at each site during a single day each month. It was also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site MMC was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all three (3) Project sites in the MDAB are estimated at 142.24 TCO₂e (129 MTCO₂e), or less than 47 TCO₂e (43 MTCO₂e) annually for proposed Project site MMC. To be consistent with the analysis of sites located in the SCAB/SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site LPC would be substantially below the AVAQMD annual 100,000 TCO₂e threshold and Council on Environmental Quality 25,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to

2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site MMC, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the AVAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site MMC would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Yes

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Lahontan

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: West Mojave

Local Agency Jurisdiction: Palmdale

General Plan Designation: Public Facility

Zoning: Public Facilities

What is the zoning height restriction, if any?:

45 feet, 65 feet with conditional use permit

City or county permit requirements for communication facilities, if any:

Depending on size, may either be an administrative approval or Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Palmdale

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 45 feet

with administrative approval or 65 feet with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Palmdale General Plan is not applicable and no conflict with the plan exists.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site MMC contains existing antenna support structures. No impacts to conservation resources are expected or identified in the West Mojave HCP.

The West Mojave Plan is a habitat conservation plan and federal land use plan amendment that (1) presents a comprehensive strategy to conserve and protect the desert tortoise, the Mohave ground squirrel and over 100 other sensitive plants and animals and the natural communities of which they are a part, and (2) provides a streamlined program for complying with the requirements of the California and federal Endangered Species Acts. None of the species addressed by the plan occur at or near Site MMC so there are no conflicts with the plan, as discussed in Section 3.3. The West Mojave HCP does not cover communication sites and does not preclude access and opportunities to build or maintain permitted communications sites. As a result, the proposed Project sites would not conflict with land use policies of the West Mojave HCP. No land use impacts would occur from placing proposed Project sites on land subject to the West Mojave HCP.

Mitigation Measure(s):

None required.

Noise

Setting

City: Palmdale

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.28 Building Construction Hours of Operation and Noise Control

Noise Level Threshold: N/A; no construction from 8 pm to 6:30 am on weekdays and Saturday, all day Sunday

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient

noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Sierra Hwy

Distance (Miles): 4.25

Disaster Route: Elizabeth Lake Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Antelope Valley Frwy

Distance (Miles): 4.17

Nearest Major Arterial: Bouquet Canyon Rd

Distance (Miles): 2.21

Access to the Project Site Provided Via: Extension off of Forest Service Road 6N07

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Antelope Valley Recycling and Disposal Facility

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST 40-34

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: MML

Site Name: Magic Mountain Link

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Santa Clarita Divide Rd

City: Above Santa Clarita

State: CA

Zip: 91387

Latitude: 34.3862165605

Longitude: -118.329290684

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

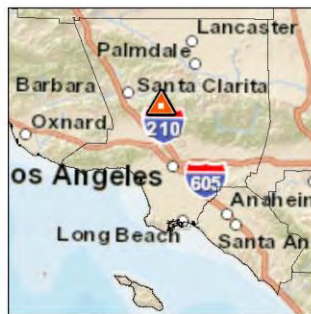
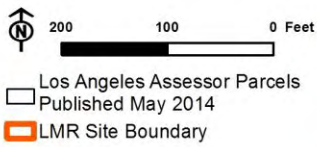
Existing Tower Type: Lattice (3)

Existing Tower Height: 150'; approx. 60'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 4868

MML Site Boundary Map



MML

Magic Mountain Link
 Angeles National Forest - 4N46 Magic Mountain Rd.
 Unincorporated, CA 91390

Proposed New Site Coordinates (NAD83):

Latitude: 34.386192
 Longitude: -118.329229
 Elevation (Feet): 4854

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



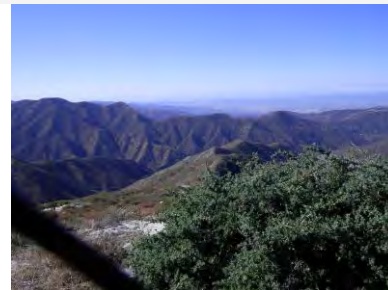
Site view looking north



Surrounding area north of site



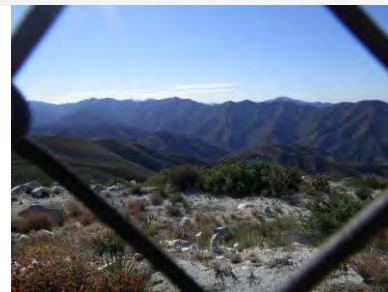
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This ridge top site is located within Angeles National Forest at a former Nike missile site that included subterranean concrete missile silos built in 1955. The site includes a lattice tower and small building enclosed within a chain link fence, and is a smaller part of a larger area that includes another taller lattice tower with attached microwave dishes adjacent to a large shelter, also enclosed by a chain link fence. The height of the towers is unknown. A utility pole, two smaller one-story equipment shelters, and fuel tank are also present. The proximity of the two sites resembles that of one site. Two large, brown water tanks are located about 200 feet north. The site is accessed from the Angeles Crest Highway, a National Forest Scenic Byway, from the intersection at Red Box Gap, a day-use area with large parking lots, picnic tables, and visitor facilities that provides access to the Gabrieleno Trail. The site is not visible from this recreation area. The existing lattice towers are intermittently visible from southbound Angeles Crest Highway, although steep topography typically blocks the towers from view. The towers rise above the existing evergreen vegetation that surrounds the site. The view is dominated by steep, primarily undeveloped ridgelines. Primary sensitive viewers are ANF visitors and travelers using the Angeles Crest Scenic Byway. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back Country

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing structures that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would

attenuate the noticeability of the new towers. In addition, locating the new towers and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site, two lattice towers, shelters, and two water tanks. Although the new towers and associated equipment would contrast and be incompatible with the visual character of the larger area, they would be compatible with the existing site and immediate surrounding landscape, which has been modified for the Nike missile site. There would be no change to the designated scenic attractiveness classification or the scenic byway designation. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For

aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Church

Distance to Sensitive Receptor: 17851

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site MML. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site MML or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site MML would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site MML will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site MML would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site MML or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site MML, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site MML, which is 17.851 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site MML and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site MML in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site MML and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - San Gabriel Mountains West - San Francisquito; Natural Landscape Block - San Gabriel Mountains West

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Bigberry manzanita chaparral [*Arctostaphylos glauca* Shrubland Alliance]; Association - *Arctostaphylos glauca*-*Cercocarpus montanus*/

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site MML is located on the top of Magic Mountain in the San Gabriel Mountains. The vegetation consists of chamise chaparral. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP). Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these structures. Pacoima Wash, approximately 1.5 miles south of Site MML is considered as potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) by the Angeles National

Forest. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area and along access roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measurable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 WEAP
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 6 Anti-perch Devices
- BIO MM 7 California Condor Protection
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 18 Nesting Bird Protection
- BIO MM 19 Trenches and Holes Management
- BIO MM 21 Protected Amphibian Protection
- BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Southern coast live oak riparian forest and woodland is within 500 feet of the project site. Site MML is hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Gabriel Mountains West Natural Landscape Block which overlaps the ranges of approximately 274 amphibian, reptile, mammal and bird species. It is also located within the Essential Habitat Connectivity Area San Gabriel Mountains West - San Francisquito that connects the San Gabriel Mountains through Soledad Canyon Northwest to Liebre/Sawmill Mountains. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local,

regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within both the direct and indirect areas of potential effects (APE). The resource (P-19-186535) is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. There are no other historical resources within the direct or indirect APEs. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within both the direct and indirect areas of potential effects (APE). The resource (P-19-186535) is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features associated resource features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian granitic rocks, unit 2, (San Gabriel Mountains Anorthosite)

Stability: Moderate pending geotechnical analysis

Soil Type: Pismo-Etsel family-Cieneba-Caperton Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of somewhat excessively drained soils that formed in material weathered from sandstone or shale. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site MML and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site MML was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site MML. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site MML would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site MML, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site MML would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Backcountry

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry. Backcountry includes areas of the national forest that are generally undeveloped with few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site for government use only in the Forest Plan. While this restriction prohibits commercial use of the site for communications, exceptions may be made for state and local government agencies; a permit for a facility that intended for emergency response is likely. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Magic Mountain is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication sites would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Antelope Valley Frwy

Distance (Miles): 2.36

Disaster Route: Sand Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Antelope Valley Frwy

Distance (Miles): 4.25

Nearest Major Arterial: Little Tujunga Canyon Rd

Distance (Miles): 3.03

Access to the Project Site Provided Via: Extension off of Forest Route 2N24

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Sunshine Canyon City/County Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: MTL2

Site Name: Mount Lukens-2

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 5150 Mount Lukens Truck Trail

City: Los Angeles

State: CA

Zip: 91011

Latitude: 34.2690675011

Longitude: -118.23822932

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

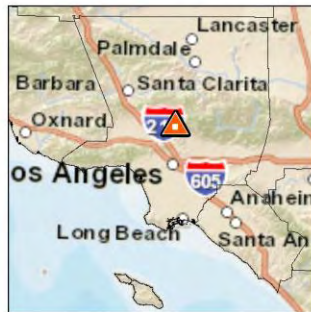
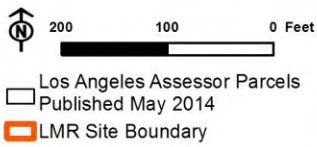
Existing Tower Type: Lattice (multiple)

Existing Tower Height: 100'; 75'; 50'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5055

MTL2 Site Boundary Map



MTL2

Mount Lukens-2

Angeles National Forest - 5150 2N76.1 Mount Lukens Truck Trail

Los Angeles, CA 91214

Proposed New Site Coordinates (NAD83):

Latitude: 34.269068

Longitude: -118.238229

Elevation (Feet): 5055

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest south of Big Tujunga Canyon Road and north of Deukmejian Wilderness Park. This specific site is a dirt lot immediately adjacent to a site that includes a large shelter, lattice tower, and propane tanks enclosed by a chain link fence. The site is within an area that includes several similar sites arranged in an east-west alignment that is served by one dirt access road. A variety of shelters and lattice towers of varying height exist within this alignment, creating several man-made vertical elements along the ridgetop. Surrounding vegetation is sparse chaparral. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Back Country, Motor Vehicle Use Restricted. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back County (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes numerous existing structures that already create a substantial visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would attenuate the noticeability of new tower. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a

staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. Although the Back Country, Motor Vehicle Use Restricted Zone allows a range of low intensity land uses, the management intent is to retain the natural character of the zone and limit the level and type of development. However, the existing visual character and quality of the site and its surroundings has already been degraded by the presence of numerous lattice towers and shelters that form a type of compound on the ridgeline. Although the new tower and associated equipment would contrast and be incompatible with the visual character of the larger area, they would be compatible with the existing site and immediate surrounding landscape, which has been highly modified. There would be no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions

from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 8171

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site MTL2. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site MTL2 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site MTL2 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site MTL2 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site MTL2 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site MTL2 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site MTL2, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site MTL2, which is 8,171 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site MTL2 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site MTL2 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site MTL2 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning - Open Space and Recreation, Wildlife Preserves and Sanctuaries;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Eriogonum fasciculatum*

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site MTL-2 is located along a ridgeline in the San Gabriel Mountains. The site contains chamise chaparral on north-facing slope and buckwheat on the south-facing slopes. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting (suitable nesting habitat may be present within one mile). The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Coast horned lizard

(*Phrynosoma blainvillii*; CDFW-SSC) may occur within the project area and individuals could be killed by project activities. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by the Angeles National Forest to occur within 2 miles of site MTL-2 in Big Tujunga Canyon. Though the project site is located in mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2) was observed in the project area during surveys conducted 9/8/2014 adjacent to areas disturbed by previous construction. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC), coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC), and Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frog, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Mark the areas requiring special protection for Davidson's bush-mallow (*Malacothamnus davidsonii*; 1B.2). Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Site MTL2 is hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within both the direct and indirect areas of potential effects (APE). The resource (P-19-186535) is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The entirety of the direct APE and three quarters of the indirect APE are encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. In addition there is one additional recorded resource within the indirect APE, Resource No. P-19-186923 (FS-05015100103-HIS) the Lukens-Clear Creek Road Complex that dates from 1907-1942. The road complex is a U.S. Forest Service Heritage Resource, but has not been designated a historical resource under CEQA. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 180-foot lattice tower; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. The project site consists solely of multiple existing, fenced, communications sites and towers. This was confirmed through archival research and a field survey conducted by both a Secretary of Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the nature of this project location and the identified resources, impacts from proposed project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within both the direct and indirect areas of potential effects (APE). The resource (P-19-186535) is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features associated resource features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and

appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained silt loam with low to very high runoff and moderate permeability. Moderate slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Los Angeles planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell

with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site MTL2 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site MTL2 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site MTL2. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site MTL2 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source

categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site MTL2, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site MTL2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: No

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Los Angeles

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Back Country Motorized Use Restricted

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: Sunland - Tujunga - Lake View Terrace - Shadow Hills - East La Tuna Canyon

Other Special District, Area or Specific Plan: San Gabriel/Verdugo Mountains Special Planning Area

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources

including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry (Motorized Use Restricted), which includes areas of the national forest that are generally undeveloped with few roads. Few facilities are found in this zone, but some may occur in remote locations. Motorized use is restricted to administrative purposes only; this includes Forest Service, other agency, or tribal government needs, as well as access needed to private land or authorized special-uses. Although this zone allows a range of low intensity land uses, the management intent is to retain the natural character of the zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. The motorized use restriction may entail additional access challenges as use of the administrative roads requires special-use authorization.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Los Angeles

Applicable Noise Ordinance: Municipal Code, Chapter IV Public Welfare

Noise Level Threshold: N/A; no construction from 9 pm to 7 am on weekdays, weekends and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry Motorized Use Restricted land use desig

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Mount Lukens is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Angeles Crest Hwy

Distance (Miles): 2.39

Disaster Route: State Route 2

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 2.36

Nearest Major Arterial: Big Tujunga Canyon Rd

Distance (Miles): 1.45

Access to the Project Site Provided Via: Mt. Lukens Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: City of Burbank Landfill #3

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: OAT

Site Name: Oat Mountain

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Palo Sola Truck Rd

City: Chatsworth

State: CA

Zip: 91311

Latitude: 34.3202153828

Longitude: -118.565747438

Jurisdiction:

Landowner: Pacific LTG Service Co.

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

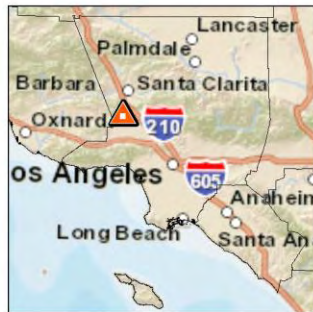
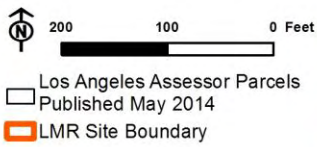
Existing Tower Type: Lattice (3)

Existing Tower Height: 170'; 120'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3333

OAT Site Boundary Map



OAT

Oat Mountain-1
 Palo Sola Truck Rd.
 Unincorporated, CA 91326

Proposed New Site Coordinates (NAD83):

Latitude: 34.320131
 Longitude: -118.565733
 Elevation (Feet): 3322

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



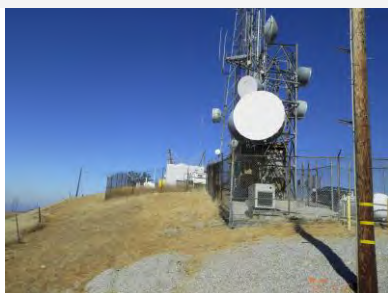
Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is in a remote area on a barren, undeveloped ridge line approximately 2 miles north of Highway 118 and 2 miles west of I-5. The site includes three existing lattice towers of various heights and a small one-story shelter on a concrete pad enclosed by a chain link fence. The largest lattice tower is 150 feet tall and several microwave dishes are attached to it. The other two are shorter and occupy a smaller footprint. Various small structures, such as a diesel tank and generator, are also on site. A row of utility poles extend southwest from the site, and a green water tank is adjacent to it. The surrounding area is primarily treeless and undeveloped; grasses and low shrubs dominate the landscape on the southern half of the area. Some small structures such as drilling rigs and several circuitous access roads are cut into the hillside to the south. Medium to tall deciduous trees are predominant on the northern side of the ridge line.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing structures that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would attenuate the noticeability of new tower. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge line, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and two lattice towers, as well as the numerous road cuts for the nearby oil rigs. The new tower and associated equipment would be compatible with the existing site and much of the surrounding landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 2745

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Less than Significant

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site OAT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site OAT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site OAT would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site OAT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site OAT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site OAT or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Emissions from the construction of proposed site MTL2 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in O3 precursor Nox, PM10 or PM2.5 for which the SCAB is in non-attainment of the NAAQS and/or CAAQS; therefore, the impact of Project construction would be less than significant. Operational emissions of proposed site MTL2 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the

types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site OAT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site OAT, which is 2,745 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 6 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site OAT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site OAT in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site OAT and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); western mastiff bat (*Eumops perotis californicus*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

California Orcutt grass (*Orcuttia californica*; ESA-E, CA-E, 1B.1); slender-horned spineflower (*Dodecahema leptoceras*; ESA-E, CA-E, 1B.1)

Sensitive Communities Recorded within 1 Mile:

California Walnut Woodland; Southern Coast Live Oak Riparian Forest; Southern Cottonwood Willow Riparian Forest; Southern Mixed Riparian Forest; Valley Oak Woodland; coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor - foraging (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); golden eagle - foraging (*Aquila chrysaetos*; CDFW-FP); western mastiff bat - foraging (*Eumops perotis californicus*; CDFW-SSC); Valley Oak Woodland

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

SEA - Santa Susana Mountains/Simi Hills; Essential Connectivity Area - Contract Point - Santa Susana Mountains

Local Policy or Ordinance for Biological Resources:

Los Angeles County General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Valley oak woodland [*Quercus lobata* Woodland Alliance]; Association- *Quercus lobata*-*Juglans californica*

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site OAT is one of a series of hilltop communications facilities along the Oat Mountain ridgeline in the Santa Susana Mountains. Valley Oak (*Quercus lobata*) Woodland occurs in close proximity in the study area. Numerous oil extraction wells and facilities are within 0.5 to 1 mile of the site, with many roads curving along ridgelines. Due to these operations there is limited vegetation on the south side of the Oak Mountain ridgeline (oak forests are on north exposures). Vegetation includes a large non-native herbaceous component with Valley Oak (*Quercus lobata*) Woodland on the north-facing slopes and canyons. The project area does not contain California Walnut Woodland,

though individual trees are present. California Orcutt grass (*Orcuttia californica*; ESA-E, CA-E, 1B.1) is a vernal pool species; slender-horned spineflower (*Dodecahema leptoceras*; ESA-E, CA-E, 1B.1) grows in mature wash benches of major drainages. The project area does not contain habitat for these species. Coastal sage scrub vegetation is not present; the project area does not contain habitat for coastal California gnatcatcher (*Poliptila californica californica*; ESA-T, ESA-CH, CDFW-SSC). Western mastiff bat (*Eumops perotis californicus*; CDFW-SSC) may forage in the project area, but no potential roost sites of cliffs with crevices, or tall trees or buildings that provide a vertical drop for the bat to take flight occur in the project area (potential roost sites may be found 0.5 to 1 mile away). The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP). Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these structures. The proposed developments include the addition of a new lattice tower that could be used as perches by condors. The project site is within the foraging range of the golden eagle (*Aquila chrysaetos*; CDFW-FP). Eagles may pass by the project site while foraging, but the area around the site does not provide steep cliffs or rocky crags used for nesting. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

A biological monitor will be present during construction and an environmental awareness program will be presented to all workers; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The Southern mixed riparian forest Sensitive Community occurs within 500 feet of the project site. Valley Oak (*Quercus lobata*) Woodland does not occur on the project site, but trees do occur in close proximity in the project area; no trees would be removed as part of project activities.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; do not remove valley oak trees or California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads; use caution to minimize the use of heavy equipment near valley oak and California walnut trees to protect the plant's root system. Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and

Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Freshwater Forested/Shrub wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to an ephemeral drainage. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within a CDFW Essential Habitat Connectivity Area Contract Point - Santa Susanna Mountains that connects the Santa Susanna Mountains eastward to the San Gabriel Mountains through Contract Point. It is also located in the approved Santa Susanna Mountains Significant Ecological Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. This SEA provides important linkages through a large open space corridor between the Santa Monica Mountains to the south, San Gabriel Mountains to the east, and the Los Padres National Forest to the north. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Construction at Site OAT could result in removal of vegetation and human disturbance at each site and therefore could result in conflict with the Los Angeles County General Plan's Policy C/NR 3.1, which calls for conservation and enhancement of ecological function diverse natural habitats and biological resources. The site contains an existing

tower facility, related infrastructure, and access road along with disturbed native scrub vegetation. The current use at the site is communications facility, and substantive removal of native vegetation is not expected. Construction and operations activities at the site do have the potential to impact biological resources, as described in Impact BIO 1 and Impact BIO 2. These impacts to resources conflict with Policy C/NR 3.1. Because a potential for significant impact associated with the resources protected by the Los Angeles County General Plan exists, this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2 would reduce impacts from construction and operations to less than significant. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Protocol Surveys • BIO MM 14 Coastal California Gnatcatcher Breeding Season Restriction • BIO MM 15 Southwestern Willow Flycatcher Protection • BIO MM 16 Snowy Plover Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Monarch Butterfly Protection • BIO MM 24 Prevent the Spread of Nonnative Vegetation • BIO MM 25 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and a field survey conducted by both a Secretary of Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which is known to be fossiliferous. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include the extinct four-legged marine mammal *Desmostylus*, walrus, and primitive baleen whale. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Rock outcrop-Lithic Xerorthents-Calleguas-Badland Association

Erosion Potential: Low to moderate potential

Expansive Soil: Low to moderate potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 3/4 of a mile south of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained clay loam and clayey shales with medium or high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site OAT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site OAT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site OAT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site OAT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site OAT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site OAT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: Approximately 400 feet from oil/gas well to the south. Verify distance.

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Non-Urban

Zoning: Heavy Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Golden State Frwy

Distance (Miles): 3.25

Disaster Route: Interstate 5/State Route 118

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 2.39

Nearest Major Arterial: Tampa Ave

Distance (Miles): 1.85

Access to the Project Site Provided Via: Extension off of Palo Sola Truck Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Sunshine Canyon City/County Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: PASPD01

Site Name: Pasadena Police Department

Site Discussion:

Propose installation of up to 27 whip and up to 5 microwave antennas on new monopole up to 70 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 214-290 Ramona St

City: Pasadena

State: CA

Zip: 91101

Latitude: 34.148077172

Longitude: -118.145055625

Jurisdiction:

Landowner: COMMUNITY DEVELOPMENT COMMISSION

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 70'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A

Existing Tower Height: N/A

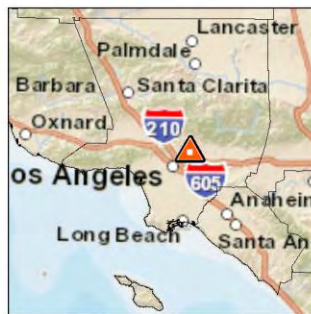
Existing Site Use: Pasadena City Police Station

Existing Ground Elevation (feet AMSL): 870

PASPD01 Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



PASPD01

Pasadena Police Dept
214-290 Ramona St.
Pasadena, CA 91101

Proposed New Site Coordinates (NAD83):

Latitude: 34.148066

Longitude: -118.144988

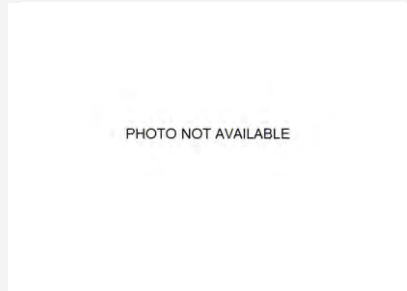
Elevation (Feet): 864

Project Site Photos

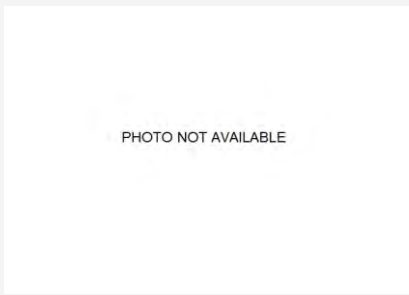
The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



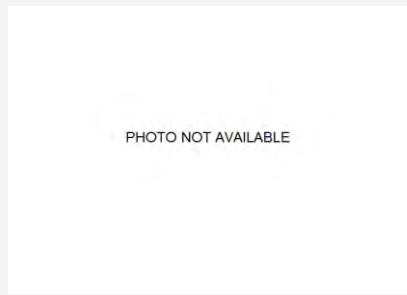
Site view looking north



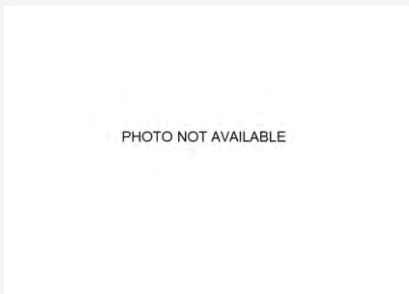
Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The Pasadena Police Department site is located on a vacant lot encompassing approximately 317 square feet within the City of Pasadena's historic civic center area. The Pasadena Civic Center District is a historic district roughly bounded by Walnut and Green Streets to the north and south, and Raymond and Euclid Avenues to the west and east. The district is a "nationally significant example of civic art in the 'City Beautiful' style of the 1920s" (NPS 1980). The centerpieces are the Pasadena City Hall, which is fronted by a large open plaza, Pasadena Public Library, and Pasadena Civic Auditorium. The district is dominated by its 1925 Beaux Arts-style City Hall and other "magnificent 1920s and 1930s buildings of the civic center" (Los Angeles Conservancy 2013). The Civic Center area is distinct from surrounding neighborhoods both in architectural style and feeling, and is less commercial and more park-like. It is a "carefully planned architectural entity" and a "unique collection of buildings and sites whose greatest value and impact arise from the fact that they relate to each other and the environment in a special way" (NPS 1980). The streets are wide and lined with trees, some paved with tile and brick set in decorative patterns. Small parks abound, and are planted with trees and flowers (NPS 1980). Several other buildings located within the historic district, including the Pasadena Public Library and First Baptist Church, incorporate similar design styles. The key buildings were designed in a homogenous style by nationally recognized architects. The site is directly south of the Pasadena Police Department, which was designed to be sensitive to the historic surroundings. The police department building has a 50-foot-high architectural tower with exaggerated scrolled buttress supports. The beige stucco walls, arched windows, terra cotta tile roof were meant to echo the 1920s-era themes of the civic center. The property is landscaped with a giant sycamore tree and drought-resistant plants (Los Angeles Conservancy 2013). Newer structures show "an abandonment of architectural standards" that are out of keeping with the Civic Center as a whole (NPS 1980). One such structure is a five-level parking garage directly north of the PASPD01 site and west of the Police Department.

Visual Sensitivity: High

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: Yes

If yes, enter name: Pasadena Civic Center Historic District

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a highly developed civic/urban setting within. Although it is located within a high sensitive viewing area (urban historic area), the site is not located within a scenic vista or within view of one.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

The site is within the City of Pasadena's historic civic center area. These proposed new project elements would not be compatible with the civic center's distinctive Beaux Arts architectural style and feeling. The new structures would represent another "abandonment of architectural standards" that would not be consistent with the setting that led to formation of the historic district. Construction impacts would be related to construction of the new tower and equipment. Construction would create dust that would temporarily affect the visual character and quality.

Mitigation Measure(s):

Under Cultural Resources, implementation of CUL MM 5 (camouflage) would reduce significant visual impacts to less than significant with mitigation incorporated. This mitigation measure would also serve to reduce significant visual and aesthetic impacts at this site to less than significant with mitigation incorporated. Refer to Cultural Resources for more information.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Office building

Distance to Sensitive Receptor: 50

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site PASPD01. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site PASPD01 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site PASPD01 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site PASPD01 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site PASPD01 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site PASPD01 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site PASPD01, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site PASPD01, which is 50 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 8 are lower than the SCAQMD thresholds for all non-attaining/maintenance pollutants but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site PASPD01 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site PASPD01 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site PASPD01 and all proposed Projects sites

would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrines anatum*; CDFW-FP); bank swallow (*Riparia riparia*; CA-T); burrowing owl (*Athene cunicularia*; CDFW-SSC); least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E); pallid bat (*Antrozous pallidus*; CDFW-SSC); southwestern willow flycatcher (*Empidonax traillii extimus*; ESA-E, CA-E); western mastiff bat (*Eumops perotis californicus*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Coulter's goldfields (*Lasthenia glabrata ssp coulteri*; 1B.1); mesa horkelia (*Horkelia cuneata var. puberula*; 1B.1); Parish's gooseberry (*Ribes divaricatum var. parishii*; 1A); white rabbit-tobacco (*Pseudognaphalium leucocephalum*; 2B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Pasadena General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site PASPD01 is totally urbanized and located in downtown Pasadena. The project area does not contain native vegetation. The structures in the vicinity are very large and old structures. Vegetation is primarily large expanses of lawn with very few trees or shrubs. The survey area does not contain native vegetation or habitat for any sensitive species of plants or wildlife. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The city of Pasadena is in the process of updating their general plan. Most of the city limits are urbanized but natural vegetation occurs in the foothills of the San Gabriel Mountains. Special interest areas with potential sensitive species has been identified in Arroyo Seco Watershed Assessment and the Eaton Wash/Canyon Corridor Plan. Hastings Canyon and the San Rafael Hills. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Pasadena General Plan includes an Open Space and Conservation Element adopted in 2012. This element includes protection measures for wildlife, native plants, habitat connectivity, and Pasadena's urban forest. None of these resources occurs at the site. As a result, the proposed project would not conflict with any biological policies outlined in the City of Pasadena General Plan.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: Yes

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

The direct APE is completely encompassed by the National Register of Historic Places-listed Pasadena Civic Center Historic District. The district encompasses 15 individual historical resources. Within the indirect APE, there are numerous additional historical resources. Among these are individual properties and historic districts that are either listed or eligible for inclusion in the National Register, the California Register of Historical Resources, or are locally designated properties or landmarks. There is also one potential National Historic Landmark district within the indirect APE. This was confirmed through archival research and a field survey conducted by both a Secretary of Interior (SOI)-qualified archaeologist and architectural historian in January 2015. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 70-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. Construction of a 70-foot monopole and its associated infrastructure features at this project location would have an adverse visual effect on the Pasadena Civic Center Historic District and surrounding historic properties within the viewshed of the indirect APE. Impacts at this project location would be out of character in both design and massing for this historic district and landscape and a significant impact; however, with implementation of CUL MM 5, significant impacts would be reduced to less than significant.

Mitigation Measure(s):

CUL MM 5 would be implemented at this project location. With implementation of CUL MM 5 (camouflage)

significant visual impacts would be reduced to less than significant.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The area is mapped as Quaternary older alluvium, which has a moderate potential for significant vertebrate fossils from the late Pleistocene. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this geologic unit within the Santa Gabriel Valley. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Quaternary older alluvium to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014

and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate pending geotechnical analysis

Soil Type: Zamora-Urban land-Ramona Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained silt to fine sandy loam with slow to medium runoff and moderately slow permeability. The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Pasadena planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located in an suburban to urban area. The fire station is within a neighborhood of homes and businesses and the monopole would be placed in previously developed area within a paved area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site PASPD01 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site PASPD01 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site PASPD01. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site PASPD01 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site PASPD01, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site PASPD01 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: Yes, University of Phoenix

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: California Title Building Heliport and Huntington Hospital Heliport

Applicable Emergency Response or Emergency Evacuation Plan: yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR Site is within 1/4 mile of multiple permitted USTs and 1 open LUST (Kaiser Permanente), 3 closed LUSTs, multiple drycleaners and auto supply and repair facilities less than 1/8 mile and upgradient from LMR Site, one CERCLIS corrective action site.

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste

transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A branch campus of the University of Phoenix is located within 0.25 mile of the proposed Project site. Construction activities could include refueling of equipment on site, which would be done using the BMPs identified in Chapter 2. Operations could include transport to and refueling of the up to 1500 gallon diesel tank integrated into the generator proposed for the site. Use, transport, and disposal of hazardous materials and wastes are required to occur in compliance with federal, state, and local regulations.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: San Gabriel Valley

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Pasadena

General Plan Designation: Central District Specific Plan

Zoning: CD-2 Central District

What is the zoning height restriction, if any?:

50 feet

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Pasadena

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for this site, the maximum allowable height of structures in this area is 50 feet.

Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of Pasadena Comprehensive General Plan is not applicable and no conflict with the plan exists.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Pasadena

Applicable Noise Ordinance: Title 9 Public Peace, Morals and Welfare, Article IV Offenses Against Public Peace, Chapter 9.36 Noise Restrictions

Noise Level Threshold: 85 dBA within 100 feet; no construction from 7 pm to 7 am on weekdays, 5 pm to 8 am on Saturday, all day Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Huntington Memorial Hospital Heliport, Mesa Heliport, Super Bowl Heliport

Distance to Nearest Off-Site Sensitive Receiver: 175 feet

Ambient Noise Level: 60 dBA

Sensitive Noise Receiver 1: First Baptist Church

Sensitive Noise Receiver 2: Multi-family Residential Dwellings

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable" community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA "normally acceptable" level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers within this distance to the site; therefore, groundborne vibrational noise impacts would be less than significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 175 feet from proposed sites would be 72 dBA and not exceed the 90 dBA daytime or 80 dBA nighttime criterion; therefore, construction impacts would be less than significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within an urban environment and adjacent to a private airstrip (Huntington Memorial Hospital Heliport, Mesa Heliport, Super Bowl Heliport). However, this site is located outside of the airstrip area where most noise is generated. Conservatively assuming a 65 CNEL at proposed Project sites such as PASPD01, this combined

baseline noise level in combination with the estimated construction noise levels for all proposed Project sites would be below the 90-Dba threshold where adverse community reaction could occur. Therefore, construction of this site would not expose people, workers or residents, to excessive noise levels.

After construction, this site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Conservatively assuming a 65 dBA CNEL at proposed Project sites located 0.25 miles from private airstrips, operation of this Project site, including the HVAC systems and emergency generators, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: N Arroyo Pkwy

Distance (Miles): 0.07

Disaster Route: Colorado Boulevard

Transit, Bicycle, or Pedestrian Facilities: Located within 0.25 miles of the LA Metro Rail

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 0.11

Nearest Major Arterial: E Colorado Blvd

Distance (Miles): 0.12

Access to the Project Site Provided Via: Ramona Street

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Scholl Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF PASADENA

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: PDC

Site Name: Pacific Design Center

Site Discussion:

Propose installation of up to 20 whip and up to 7 microwave antennas on roof top of existing building without exceeding current overall height of the structure including appurtenances. Propose indoor equipment racks to be located in room in existing building, or in a new up to 600 square foot shelter on building roof, or up to 600 square foot shelter on adjacent grounds (prefab or CMU). Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank adjacent to the building.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 100 cubic yards removed

Proposed trenching for underground conduits to accommodate power and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide

Proposed foundations include:

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 8687 Melrose Ave

City: West Hollywood

State: CA

Zip: 90069

Latitude: 34.0837431714

Longitude: -118.383131762

Jurisdiction:

Landowner: Pacific Red LLC.

Proposed LMR Facilities

Antenna Support Structure: Rooftop

New Support Structure Height: N/A

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

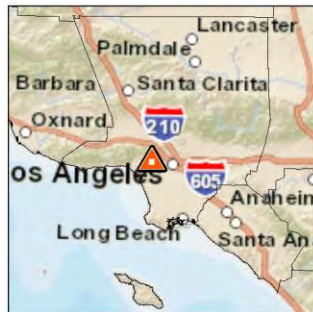
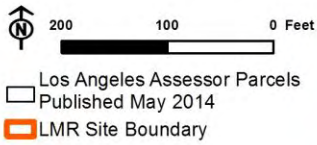
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: Commercial Building

Existing Ground Elevation (feet AMSL): 213

PDC Site Boundary Map



PDC

Pacific Design Center
 8687 Melrose Ave.
 West Hollywood, CA 90069

Proposed New Site Coordinates (NAD83):

Latitude: 34.083713
 Longitude: -118.383117
 Elevation (Feet): 201

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



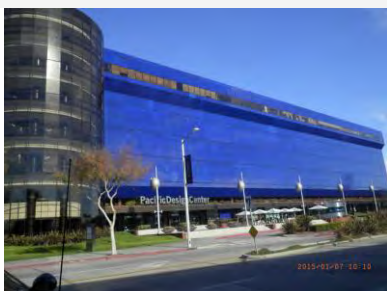
Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is one of three ultra-modern buildings that constitute the Pacific Design Center in West Hollywood. The Pacific Design Center sells interior building supplies within a 1.2 million square-foot complex with over 120 showrooms. The complex includes three massive, multi-story “centers” in bold colors —blue, green, and red — each with a distinctive and unusual shape and sleek façade. The site is located on the red building. The center also includes two restaurants, a theater, conference center, and fitness center. Landscaping around the complex includes palm trees, shrubs, and a pool with fountains. The massive forms, vivid colors, and unusual shapes formed by the buildings within the design center are a stark contrast to the neighboring buildings in this urban area. A small landscaped park consisting of hardscape, lawns, and low shrubs and trees, is directly opposite San Vicente Blvd, a 5-lane roadway. Smaller commercial buildings are adjacent to the site, and Melrose Avenue to the south includes storefronts that have a traditional “Main Street” feel that contrasts sharply with the design center. The red building, and hence, the site, is a dominant visual feature for residents of the single- and multi-family buildings dwellings directly east of the site. The site is less evident from other locations within a 0.25-mile radius.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a commercial/residential urban setting that includes a large commercial building complex. The site is not within a scenic vista or within view of one.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Operational impacts would result from mounting whip and microwave antennas to an existing antenna mounting platform on the penthouse on the roof of the red design center building. The proposed new facilities would be obscured from view and would be compatible with the existing visual character and quality, which consists of a large commercial complex that is surrounded primarily by residences. Short-term construction impacts would not affect visual character or quality given the height of the building.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site is in an urban area. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Police station

Distance to Sensitive Receptor: 60

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site PDC. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site PDC or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site PDC would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site PDC will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site PDC would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site PDC or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site PDC, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site PDC, which is 60 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, lower for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site PDC and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site PDC in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site PDC and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1)

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of West Hollywood General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site PDC is located at the base of the east side of the Hollywood Hills entirely within an urban setting containing buildings, roads, paved parking areas, and landscaped areas. The Pacific Design Center is a complex of extremely large buildings surrounded by walkways, lawn, and ornamental trees. The site contains a multi-story parking structure. The survey area does not contain habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, CNPS 1B.1). Monarch butterflies may pass through the project area, but suitable roost sites are lacking. The antennae would be placed on the roof on one of the buildings.

Mitigation Measure(s):

None required.

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

According to the city general plan the city limits are completely urbanized and the only open space are 15.3 acres of parks and vacant lots. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of West Hollywood General Plan does not include policies to protect biological resources.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). The direct APE consists solely of the Pacific Design Center (Red Building), which was built in 2012 and, based on archival research and field survey, is not a historical resource. Within the indirect APE there are more than 60 historical resources, including individual properties and historic districts. These properties are listed in or eligible for inclusion in the National Register of Historic Places, the California Register of Historical Resources, or are locally designated properties or landmarks. The closest of the historical resources to the direct APE are Resource No. P-19-176757, the Pacific Design Center (Blue Building), which is approximately 500 feet to the southeast and Resource No. P-19-189252, the San Vicente Branch Library, which is approximately 430 feet to the southwest. Both of these buildings are eligible for listing in both the National and California Registers. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. LMR activities at this project location include the attachment of whip and microwave antennas to an existing antenna mounting platform recessed within the PDC roofline; proposed indoor equipment racks would be located in an existing equipment room inside the building. Given the height of this building (15 stories including 5 parking levels) and the low profile of the proposed antennas within the recessed platform, there would be no visual effects on any of the surrounding historical resources; therefore, there would be no impacts on historical resources at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as low sensitivity younger Quaternary alluvial sediments at the surface. However, these deposits typically overlie older geologic units that may contain significant vertebrate fossils at depth. No localities are recorded within the proposed site; however fossil localities have been recorded in the vicinity. Recovered fossils include extinct horse from unspecified depth. Similar Quaternary sediments in the Los Angeles Basin have produced significant fossils at depths as shallow as two to eight feet. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Periodic paleontological spot checks are required when excavation exceeds depths of five feet into the Quaternary alluvium to determine if older, paleontologically sensitive sediments are present. If present, monitoring would be conducted during excavation into paleontologically sensitive sediments to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Sorrento-Hanford Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: Yes

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1/8 of a mile east of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards such as liquefaction prior to issuance of a building permit. Existing structures

were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or liquefaction would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of West Hollywood planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards such as liquefaction prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or liquefaction would be less than significant.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site PDC and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site PDC was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site PDC. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site PDC would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site PDC, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site PDC would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: Yes

If yes, please explain: There is 1 WDR site, opened on 4/20/2015 no reports available and one Military site reported in a INPR report. The site was declared ineligible for FUDS, no report of hazardous chemical release associated with the INPR.

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: Multiple closed LUSTs on-site. LMR Site within 1/4 mile of permitted 1 USTs and 2 open closed LUST sites. FUDS less than 1/8 mile from LMR.

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: Yes

If yes, please explain: 7 gas wells within 200 FT of LMR Site Boundary. All wells are reported as plugged and therefor do not present a methane hazard.

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with

transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed Project site is included in the Cortese List with multiple closed LUSTs on target property. Excavation would be limited to trenching for utilities/fiber, however, effort should be made to locate and characterize potential contamination associated with any soils excavated prior to construction to prevent exposure to existing contaminants. If contaminants are encountered, all excavation activity and excavated soils would be managed in accordance with applicable regulations. Operations activities would not trigger exposures to contaminants.

Mitigation Measure(s):

HAZ MM 1 - Prior to construction activity on proposed Project sites listed above in HAZ-4, the construction

contractor must prepare a Phase I Environmental Site Assessment meeting the standards outlined in the American Society for Testing Materials (ASTM), Practice for Limited Environmental Due Diligence: Transaction Screen Process E 1528.

- Phase I documents shall be reviewed to determine if the lateral and vertical extent of impacted soil and/or groundwater will be encountered by proposed construction activities.
- If proposed construction activities will not encounter impacted soil or groundwater based on the documented vertical and lateral extent, no further action will be required.
- If it is determined that the construction footprint will encounter impacted soils or encounter impacted groundwater, the contractor shall prepare a site-specific Health and Safety Plan that meets the requirements of 29 CFR 1910 for worker safety.
- If the lateral and vertical extent or the nature of the impacted soil cannot be determined from available documents, a Phase II investigation shall be completed to determine if the soils and/or groundwater that may be encountered during construction (within the footprint any excavation) are impacted. The Phase II investigation shall also determine the nature of contaminations that may be encountered.
- The Phase II report should also address disposal alternatives and procedures for any impacted soil that may be encountered or groundwater which may need to be removed.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency

responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Coastal Plain Of Los Angeles

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting

process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: West Hollywood

General Plan Designation: C4 (Unknown)

Zoning: Pacific Design Center Specific Plan

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Project Conformity Review

Comprehensive Plan or General Plan Local Agency: West Hollywood

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing building and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: West Hollywood

Applicable Noise Ordinance: Title 9 Public Peace, Morals and Safety, Article 2 Miscellaneous, Chapter 9.08 Noise

Noise Level Threshold: N/A; no construction from 7 pm to 8 am on weekdays and Saturdays, or at time on Sunday and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 60 dBA

Sensitive Noise Receiver 1: West Hollywood Park

Sensitive Noise Receiver 2: West Hollywood Pool

Sensitive Noise Receiver 3: West Hollywood Library

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. Sensitive receivers (recreational uses) are located within 25 feet of Project site PDC; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site PDC, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.

- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

• Prior to commencement of construction aSite PDC, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime threshold. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Santa Monica Blvd

Distance (Miles): 1.59

Disaster Route: Santa Monica Boulevard

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Interstate 10

Distance (Miles): 0.07

Nearest Major Arterial: N Robertson Blvd

Distance (Miles): 0.09

Access to the Project Site Provided Via: N. San Vicente Boulevard

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: City of Burbank Landfill #3

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF LOS ANGELES

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: PHN

Site Name: Puente Hills

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Near Vantage Point Dr.

City: Rowland Heights

State: CA

Zip: 91748

Latitude: 33.955940405

Longitude: -117.895021594

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

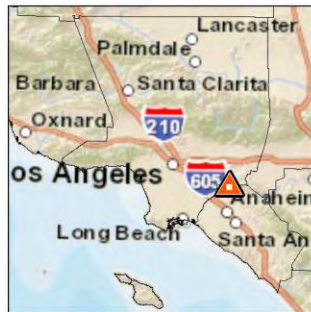
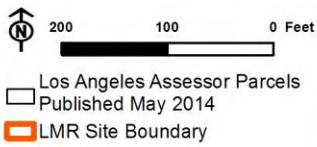
Existing Tower Type: Lattice (2)

Existing Tower Height: 170'; unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1427

PHN Site Boundary Map



PHN

Puente Hills
 Vantage Pointe Dr.
 Unincorporated, CA 92821

Proposed New Site Coordinates (NAD83):

Latitude: 33.955785
 Longitude: -117.894863
 Elevation (Feet): 1428

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



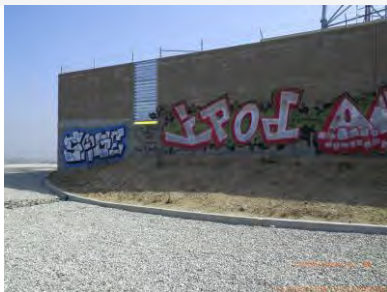
Surrounding area north of site



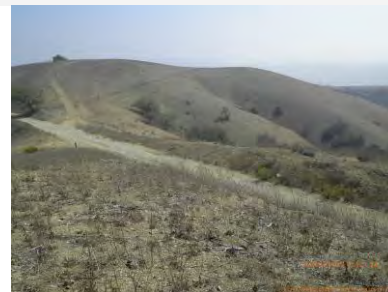
Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is on an undeveloped hill top and consists of a 150-foot tall lattice tower with three microwave dishes attached, a small shelter, and propane tank enclosed within a chain link fence on a small concrete pad. The site is adjacent to the Puente Hills Nike missile site, which includes an abandoned guard shack, rectangular concrete pad, two triangular radar tower platforms, and a one-story square structure. The surrounding area is undeveloped. Vegetation is predominantly grasses and scattered low trees to the north and in the drainages to the south. Cattle graze in the area. A large, bright white water tank is on the periphery of the area to the northwest. A smaller, brown water tank is west of the site and surrounded by vegetation, which helps obscure it from view. A fence encloses a large area that includes the existing site, Nike missile site, and a swath of land to the northwest.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing structures that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing structures, which would attenuate the noticeability of new tower. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge line, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and lattice towers, as well as the Nike missile site radio tower platforms. The new tower and associated equipment would be compatible with the existing site and adjacent disturbed sites. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Water tower

Distance to Sensitive Receptor: 70

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site PHN. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site PHN or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site PHN would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site PHN will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site PHN would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site PHN or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site PHN, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site PHN, which is 70 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 10 are higher than the SCAQMD thresholds for No_x, CO, below for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site PHN and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site PHN in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site PHN and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Sensitive Communities Recorded within 1 Mile:

California Walnut Woodland; Southern Coast Live Oak Riparian Forest; coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC); California Walnut Woodland

Designated Critical Habitat Within 500 Feet:

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

SEA - Puente Hills (Tonner Canyon-Chino Hills); SCAG Zoning - Open Space and Recreation; Wildlife Linkage – Puente Chino Hills (Choke-point)

Local Policy or Ordinance for Biological Resources:

Los Angeles County General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Non-native Grassland

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site PHN is located in the Puente Hills on a hilltop with existing communication towers and associated facilities; the compound is paved and fenced. The immediate area adjacent to the compound is either mowed or treated with herbicide. The project area is primarily non-native grassland with small patches of coastal sage scrub vegetation on steep slopes; California black walnut (*Juglans californica*) woodland and coast live oak (*Quercus agrifolia*) are found on slopes and in drainage channels. The project area is within designated critical habitat for the coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC). However, only small patches of coastal sage scrub vegetation are found on steep slopes near the perimeter of the project area. No suitable nesting habitat for the gnatcatcher occurs within the project area. The project area does not contain canyon habitat for the many-stemmed dudleya (*Dudleya multicaulis*; 1B.2). Disturbance to or destruction of nests of native bird species that are

protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coastal California gnatcatchers (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; do not remove coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]). Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. No construction activities during the gnatcatcher breeding season. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats within 500 feet of the project site. California black walnut (*Juglans californica*) woodlands are found within the project area on the north-facing slopes beginning about 150 feet below the existing facility.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; do not remove California walnut trees. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Recommended Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Riverine. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from

stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the proposed Puente Hills (Sycamore and Turnbull Canyons) Significant Ecological Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. This SEA has been found to support significant wildlife movement as well as residential habitat, and serves as a linkage between the Puente Hills and Chino Hills. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Construction at Site PHN could result in removal of vegetation and human disturbance at each site and therefore could result in conflict with the Los Angeles County General Plan's Policy C/NR 3.1, which calls for conservation and enhancement of ecological function diverse natural habitats and biological resources. The site contains an existing tower facility, related infrastructure, and access road along with disturbed native scrub vegetation. The current use at the site is communications facility, and substantive removal of native vegetation is not expected. Construction and operations activities at the site do have the potential to impact biological resources, as described in Impact BIO 1 and Impact BIO 2. These impacts to resources conflict with Policy C/NR 3.1. Because a potential for significant impact associated with the resources protected by the Los Angeles County General Plan exists, this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2 would reduce impacts from construction and operations to less than significant. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Protocol Surveys • BIO MM 14 Coastal California Gnatcatcher Breeding Season Restriction • BIO MM 15 Southwestern Willow Flycatcher Protection • BIO MM 16 Snowy Plover Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Monarch Butterfly Protection • BIO MM 24 Prevent the Spread of Nonnative Vegetation • BIO MM 25 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: Yes

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, there are significant fossil localities recorded in the vicinity. Recovered fossils include the holotype specimen of the fossil Sciaenid fish, *Seriphus lavenbergi*. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Soper-Fontana-Calleguas-Balcom-Anaheim Association

Erosion Potential: Low Potential

Expansive Soil: Moderate potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line (Whittier Fault) has been identified approximately 1/2 of a mile south of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site ranges from a well-drained gravelly loam to a clay loam with rapid runoff and moderately slow permeability. Moderate slopes surround the flat site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site PHN and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site PHN was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site PHN. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site PHN would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site PHN, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site PHN would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Rowland Heights Community Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: Yes

Trail Name: Located within 0.25 miles of Schabarum Extension Trail

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Orange Frwy

Distance (Miles): 2.22

Disaster Route: State Route 57

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Orange Frwy

Distance (Miles): 1.59

Nearest Major Arterial: Brea Canyon Rd

Distance (Miles): 1.05

Access to the Project Site Provided Via: Vantage Pointe Drive

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: ROLAND W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: PMT

Site Name: Pine Mountain

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of two (2) up to 85kW diesel generators each with up to 1,500 gallon belly tanks. Propose installation of two solar arrays up to 1500 square feet total. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 10,000 square feet

Permanent disturbance area: Up to 8,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Hwy 39 to 2N24

City: above Azusa

State: CA

Zip: 91702

Latitude: 34.2234622513

Longitude: -117.901985642

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (2)




Existing Tower Height: 20' each

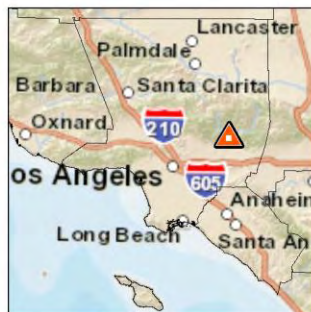
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 4537

PMT Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



PMT

Pine Mountain
Angeles National Forest - 2N24A Pine Mountain
Unincorporated, CA 91702

Proposed New Site Coordinates (NAD83):

Latitude: 34.223444
Longitude: -117.90205
Elevation (Feet): 4531

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest west of San Gabriel Reservoir on an undeveloped ridgeline accessible via a gated dirt road. Vegetation is sparse and consists primarily of low shrubs. The site is approximately 500 feet southeast of, and at a lower elevation than, an existing site that includes a small cleared area with two lattice towers approximately 30 feet tall. One tower has three microwave dishes attached. A solar array consisting of approximately 5 panels is also on-site. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Experimental Forest, which is generally closed to the public except by permit.

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Back County (Motorized Use Restricted)

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present, particularly given the prominence of the unobstructed ridge top. However, the new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new monopole would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structure. In addition, locating the new monopole and equipment in proximity to the existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a state scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings has already been degraded by the presence of an existing site and lattice towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. There would be no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Reservoir

Distance to Sensitive Receptor: 13030

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site PMT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site PMT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site PMT would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site PMT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site PMT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor Nox would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site PMT or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site PMT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site PMT, which is 13,030 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 9 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site PMT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site PMT in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site PMT and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

Rock Creek broomrape (*Orobanche valida* ssp *valida*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

Canyon Live Oak Ravine Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); Rock Creek broomrape (*Orobanche valida* ssp *valida*; 1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA – San Gabriel Canyon; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga; Natural Landscape Block - San Gabriel/Cucamonga

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Mountain white thorn chaparral [*Ceanothus cordulatus* Shrubland Alliance];

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site PMT is located on a remote mountain top in the San Gabriel Mountains. The project area is within the montane chaparral vegetation community. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in Bear Creek and portions of the West Fork of the San Gabriel River, about 1.5 miles to the northeast of Site PMT. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland,

regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Site PMT is hydrologically connected to the West Fork of the San Gabriel River. Rock Creek broomrape (*Orobanche valida* ssp. *Valida*; 1B.2) is a parasitic herbaceous plants; its host plant is silk tassel bush (*Garrya* sp). Silk tassel bush was observed in the project area during the habitat assessment survey conducted on 9/24/2014 but the broomrape was not; a summer surveys is necessary to detect broomrape though the dense vegetation and steep terrain surrounding the site would preclude a thorough survey. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) and Rock Creek broomrape; *Orobanche valida* ssp *valida*; 1B.2) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct summer botanical survey for Rock Creek broomrape and its host plant the silk tassel bush; if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Canyon Live Oak Ravine Forest was not observed within the project area.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Gabriel/Cucamonga Natural Landscape Block which overlaps the ranges of approximately 261 amphibian, reptile, mammal and bird species. It is also located within an Essential Connectivity Habitat Area that connects the Pleasant View Ridge and San Dimas Natural Landscape Blocks. Additionally, this site is located within the Proposed San Gabriel Canyon Significant Ecological Area. According to the Los Angeles General Plan, this SEA provides for consistent seasonal movement up and down its many drainages, particularly for large mobile mammals. It also provides movement and residential habitats for riparian-favoring birds. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. This SEA However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. There are no other historical resources within the direct or indirect APEs. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed lattice tower (up to 180 feet in height); construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. The direct APE consists solely of two existing fenced communications facilities on paved or compacted earth areas and a dirt access road. Based on the nature of this project site and the identified resources, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within both the direct and indirect areas of potential effects (APE). Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian igneous and metamorphic rock complex

Stability: Moderate pending geotechnical analysis

Soil Type: Tollhouse-Rock outcrop-Etsel family-Bakeoven Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line (Sierra Madre) has been identified approximately 1/3 of a mile south of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of excessively-drained, coarse sandy to gravelly loam with rapid to very rapid runoff and moderately rapid permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site PMT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site PMT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site PMT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site PMT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site PMT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site PMT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Back Country

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Backcountry. Backcountry includes areas of the national forest that are generally undeveloped with few roads. Most of the national forest's remote recreation and administrative facilities are found in this zone. The level of human use and infrastructure is generally low to moderate. The zone is managed for motorized public access on designated roads and trails. Although this zone generally allows a broad range of uses, the management intent is to retain the natural character inherent in this zone and limit the level and type of development (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site for government use only in the Forest Plan. While this restriction prohibits commercial use of the site for communications, exceptions may be made for state and local government agencies; a permit for a facility that intended for emergency response is likely. Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Backcountry land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Pine Mountain is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: San Gabriel Canyon Rd

Distance (Miles): 5.1

Disaster Route: State Route 39

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Interstate 605

Distance (Miles): 6.37

Nearest Major Arterial: San Gabriel Canyon Rd

Distance (Miles): 2.22

Access to the Project Site Provided Via: Extension off of Forest Route 2N24

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Scholl Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: PWT

Site Name: Portshead Water Tank

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on new monopole up to 28 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 5961 S. Cavalleri Rd

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0339542518

Longitude: -118.802723227

Jurisdiction:

Landowner: US Government, National Park Service

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 28'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A




Existing Tower Height: N/A

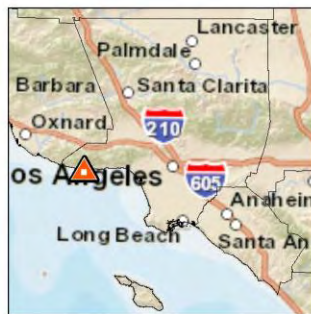
Existing Site Use: Water Tank

Existing Ground Elevation (feet AMSL): 173

PWT Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



PWT

Portshead Tank
5961 S. Cavalleri Rd.
Malibu, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.033908
Longitude: -118.802664
Elevation (Feet): 542

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in the Santa Monica Mountains National Recreation Area within Zumas/Trancas Canyons and is managed by the NPS. The site includes a white, 24-foot tall water tank set into a cut slope on a concrete pad at the end of an access road that connects to Cavalleri Road via Kanan Dume Road. A second, smaller water tank on the west side of the existing one has been removed. A utility pole is the tallest vertical structure. A few low shrubs and trees are along the site's perimeter. The site is located approximately 0.2 mile west of Kanan Dume Road within the coastal zone in the City of Malibu. The City of Malibu has designated Kanan-Dume Road as a scenic road within the city. The road travels north from the city into the Santa Monica Mountains and the NRA. The city defines scenic roads as those "traversing or providing views of areas of outstanding scenic quality, containing striking views of natural vegetation, geology, and other unique natural features, including the ocean" (City of Malibu 2002). A low density residential area is south of the site, which is otherwise surrounded by undeveloped land that is sparsely vegetated. The Ocean View Trail circles around the north side of the site. This trail combines with the Canyon View Trail to create a 3-mile loop that winds through chaparral covered slopes, offering good views of the ocean and the canyon floor. The trails also pass through a coastal sage scrub community (NPS 2009).

Visual Sensitivity: High

On federally administered public lands: Yes, National Park Service

If yes, enter applicable ratings: None

Within the California coastal zone boundary: Yes, City of Malibu Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Kanan-Dume Road

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new monopole would be approximately the height of the existing water tank, and shorter than the existing utility pole. Although the monopole would introduce a new vertical element to the site, it would only be approximately 4 feet taller than the existing water tank, and would not perceptibly change the scenic vista due to its slender girth. In addition, the monopole would be at a lower elevation than the Ocean View Trail that curves around the site to the north, so the structure would be below the visual plane of ocean views from the trail. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

New facilities would be located within an existing site on an asphalt surface. The construction staging area would also be located in the same area. No removal of or damage to scenic resources would occur.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings has already been degraded by the presence of the 24-foot white water tower, which is a large, brightly-colored man-made mass on a hillside with sparse, low vegetation. The new monopole and associated equipment would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 529

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site PWT. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site PWT or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Less than Significant**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site PWT would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site PWT will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site PWT would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site PWT or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site PWT, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site PWT, which is 529 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, below for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site PWT and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site PWT in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site PWT and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); coastal California gnatcatchers (*Polioptila californica californica*; ESA-T, CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1);

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

NPS - Santa Monica Mountains National Recreation Area; Santa Monica Coastal Resource Area; SCAG Zoning - Open Space and Recreation; Natural Landscape Block - Zuma/Trancas Canyons/Santa Monica Mountains;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Santa Monica Mountains National Recreation Area General Management Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California sagebrush scrub [*Artemisia californica* Shrubland Alliance]; Association-*Artemisia californica*-*Malosma laurina*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site PWT is located on a hillside slope within a cut-slope constructed for the installation of the water tank. The ground surrounding the tank has revegetated with both native and non-native species, but this perimeter extending up to about 100 feet from the tank is regularly mowed. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting. The project site is surrounded by fairly extensive stands of coastal sage scrub vegetation; there is evidence of past fires. Protocol surveys for coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC) were conducted in 2014 and no birds were detected. Habitat was

considered to be marginally suitable for the gnatcatcher based on the vertical structure, shrub density, slope, and habitat fragmentation. There are no reported observations of gnatcatchers within several miles of the project area. Also, corvids, potential predators of the gnatcatcher were common throughout the area. California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) is known to occur in Ramirez Canyon; the drainage is about 0.5-miles west of Site PWT, but the location of the frogs within the canyon is not available from Santa Monica National Recreation Area. Though no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Site PWT is hydrologically connected to lower Ramirez Canyon. Monarch butterfly (*Danaus plexippus*, ESA-Pet) are expected to pass through the area during migration; suitable roost trees were not observed within the survey area during the habitat assessment survey. Potentially suitable habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1) is within coastal sage scrub vegetation. Designated critical habitat about 1 mile to the northwest in a similar ecological setting. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) and coastal California gnatcatchers (*Polioptila californica californica*; ESA-T, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; especially coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]). Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct protocol surveys for the gnatcatcher; if nesting is present within the project area limit construction activities to the non-breeding season. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Preconstruction surveys would verify if Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1) is present; protect as necessary. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 14 Coastal California Gnatcatcher Protocol Surveys • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community occur within 500 feet of the project site. Site PWT is hydrologically connected to Ramirez Canyon, a drainage occupied by California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC).

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Zuma/Trancas Canyons/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 297 amphibian, reptile, mammal and bird species. The site is also located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the SMMNRA GMP would be made by the NPS. Construction activities could impact species and introduce non-native species, conflicting with SMMNRA GMP goals.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local,

regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, National Park Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

Yes

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no recorded historical resources within the direct area of potential effects (APE). The direct APE consists solely of a fenced infrastructure feature consisting of a large water tank on a paved surface. Within the indirect APE, there are eight prehistoric archaeological sites. Of the sites (Resource No. P-19-002158) is a National Register of Historic Places (National Register)-eligible site that encompasses a variety of prehistoric elements and artifacts. There is also an associated 1950s-vintage refuse deposit. Although no osteological material has been recorded, researchers of this site believe that it is probably present. LMR construction at this project location includes the attachment of whip antennas on a proposed 28-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. Given the proximity of Resource No. P-19-002158 to the direct APE there is a high probability to encounter archaeological materials during LMR construction. This was confirmed through archival research and during a field survey of the direct APE conducted by an SOI-qualified archaeologist in January 2015. Based on the nature of this project site and the identified resources, impacts from project activities would be significant; however, implementation of mitigation measures would reduce impacts to less than significant levels.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archeological monitoring would be required during all ground disturbing activities and monitors would restrict access to P-19-002158 during LMR

construction. In addition, because this project location is on National Park Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no recorded historical resources within the direct area of potential effects (APE). The direct APE consists solely of a fenced infrastructure feature consisting of a large water tank on a paved surface. Within the indirect APE, there are eight prehistoric archaeological sites. Of the sites (Resource No. P-19-002158) is a National Register of Historic Places (National Register)-eligible site that encompasses a variety of prehistoric elements and artifacts. There is also an associated 1950s-vintage refuse deposit. Although no osteological material has been recorded, researchers of this site believe that it is probably present. LMR construction at this project location includes the attachment of whip antennas on a proposed 28-foot monopole; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. Given the proximity of Resource No. P-19-002158 to the direct APE there is a high probability to encounter archaeological materials during LMR construction. This was confirmed through archival research and during a field survey of the direct APE conducted by an SOI-qualified archaeologist in January 2015. Based on the nature of this project site and the identified resources, impacts from project activities would be significant; however, implementation of mitigation measures would reduce impacts to less than significant levels.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archeological monitoring would be required during all ground disturbing activities and monitors would restrict access to P-19-002158 during LMR construction. In addition, because this project location is on National Park Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, this formation has produced numerous fossil specimens throughout the Santa Monica Mountains region. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Human remains have not been previously recorded within the direct area of potential effects (APE); however, based on archival research and a field survey in January 2015, there is a moderate to high probability for them to occur at this project location. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitoring will be undertaken during all ground disturbing activities to ensure that human remains are not disturbed during LMR construction. Monitors would also restrict access to P-19-002158 during LMR construction.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. However, archival research and a field survey conducted in January 2015 indicate that they are present within this project location and could be impacted by LMR construction. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitoring will be undertaken during all ground disturbing activities to ensure that human remains are not disturbed during LMR construction. Monitors would also restrict access to P-19-002158 during LMR construction.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by low angle to moderate slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1/8 of a mile north of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained light clay loam with low to very high runoff and moderate permeability. Moderate slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Malibu planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located at water tank pad that has been cut into bedrock. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site PWT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site PWT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site PWT. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site PWT would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site PWT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site PWT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Conejo-tierra Rejada Volcanic

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. While this site is situated in an area downgradient of moderate to steep slopes, it is not listed by California Geologic Survey as being within a Landslide Zone. However, due to its location downgradient of these slopes, some risk of surprise inundation by mudflow exists during construction.

Mitigation Measure(s):

GEO MM 1. Performance of a geotechnical report at the site, a condition of construction during the building permitting process would identify if there were a requirement for additional design features to prevent impacts associated with mudflow.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: NPS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Malibu Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Malibu

General Plan Designation: Public Open Space

Zoning: Public Open Space

What is the zoning height restriction, if any?:

28 feet

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Malibu

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site PWT is located approximately 800 feet from Kanan Dume Road, a designated Scenic Road, on a parcel that supports an approximately 24-foot-tall storage tank within the City of Malibu Coastal Zone. The City of Malibu Coastal Zone Land Use Plan was certified by the California Coast Commission on September 13, 2002 and provides for communication facilities as a conditional use in all land use designations. Policies in the Land Use Plan include avoiding or minimizing impacts to Environmentally Sensitive Habitat Areas and scenic resources; avoiding facility visibility from public viewing areas; and co-locating facilities where feasible. Per Local Implementation Plan Policy 3.14.1, the general requirements for every wireless telecommunications facility and antenna include development standards specifying that the maximum height of ground or building-mounted antennae shall not exceed 28 feet. However, if the antennae elements are mounted flush on an existing structure that exceeds 28 feet, the antennae elements may be equal to the height of the building. Roof-mounted antennae may extend no more than 3 feet

about the roof from which they are attached. Per Land Use Plan Policy 6.5, new development shall be sited and designed to minimize adverse impacts on scenic areas visible from scenic roads to the maximum feasible extent. The proposal is to mount whip antennas on a proposed 28-foot-tall monopole at a site that currently does not include communications facilities. Terrain screens the 24-foot-tall storage tank from views along Kanan Dume Road, and the proposed 28-foot-tall monopole also would be screened from view. The proposal is in compliance with the City of Malibu Coastal Zone Local Implementation Plan section on wireless telecommunications antennae and facilities as well as other city plans, policies, and ordinances.

Site PWT is also on National Park Service Land. In accordance with the Superintendent's Compendium of Designations, Closures, Permit Requirements, and Other Restrictions Imposed under Discretionary Authority (NPS 2014b), construction of a structure requires a permit from the Superintendent, but wireless communications site development or use are not otherwise specified for this unit of the NPS system. The Authority would apply for the permit and adhere to the terms and conditions.

The final determination of consistency would be made by NPS. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and this is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Malibu

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.24 Noise

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays, before 8 a.m. or after 5 p.m. on Saturday, or any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 300 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers within this distance to the site; therefore, groundborne vibrational noise impacts would be less than significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 300 feet from proposed sites would be 63 dBA and not exceed the 90 dBA daytime or 80 dBA nighttime criterion; therefore, construction impacts would be less than significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (kW) to 100 kW power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 dBA at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 dBA. The resulting noise emissions would be 58 dBA at 21 feet or 56 dBA at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 dBA to 60 dBA. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 dBA) or nighttime (80 dBA) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working

in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: City of Malibu Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: Yes

If yes, Plan or Designation Area: National Park Service Santa Monica Mountains National Recreation Area

National or California State Park: Yes

If yes, Plan or Designation Area: Santa Monica Mountains National Recreation Area

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: Within Santa Monica Mountains National Recreation Area

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles): 0.83

Disaster Route: Kana Dume Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Us Highway 101

Distance (Miles): 0.8

Nearest Major Arterial: Portshead Tank

Distance (Miles): 0.13

Access to the Project Site Provided Via: Extension off of Cavalleri Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST #29

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: RIH

Site Name: Rio Hondo

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Near Workman Mill Rd

City: Whittier

State: CA

Zip: 90601

Latitude: 34.0167378286

Longitude: -118.01531926

Jurisdiction:

Landowner: Los Angeles County, Sanitation District 18

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice




Existing Tower Height: 150'

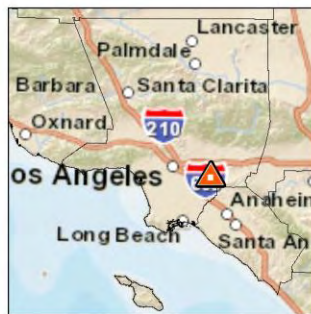
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1171

RIH Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



RIH

Rio Hondo
Near Workman Mill Rd.
Whittier, CA 90601

Proposed New Site Coordinates (NAD83):

Latitude: 34.016752
Longitude: -118.015377
Elevation (Feet): 1169

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



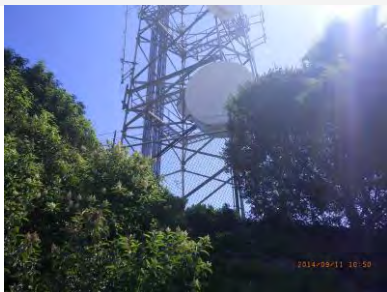
Surrounding area north of site



Site view looking south



Surrounding area south of site



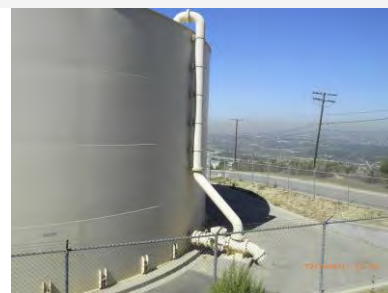
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is located on a ridgeline at an elevation of 1,165 feet and consists of a wide, 150-foot tall lattice tower with several microwave dishes attached, a small one-story windowless shelter, and a fuel tank on an asphalt base surrounded by a chain link fence. A few medium sized deciduous trees are enclosed within the fence along the periphery of the site. Three similar sites with lattice towers (one substantially taller) and attached microwave dishes is immediately east of the site. A large white water tank is immediately west of the site. The northern half of the area is a mine or quarry, and includes reclaimed areas. The southwestern area includes cemetery plots within a memorial park and mortuary. The southeastern area is primarily agricultural. The south central area (immediately south of the site) is an undeveloped hillside consisting of grasses and some scattered low shrubs and trees.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located adjacent to a quarry/mine and is not within a scenic vista.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The new facilities would be located within a site that includes existing towers that have already altered the landscape. In addition, the surrounding landscape has been heavily impacted by quarry/mining activities that have cut terraces into the hillsides and removed a substantial amount of vegetation. For these reasons, no impacts to visual character and quality would occur.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Cemetery

Distance to Sensitive Receptor: 877

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site RIH. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site RIH or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site RIH would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site RIH will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site RIH would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site RIH or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site RIH, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site RIH, which is 877 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 11 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site RIH and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site RIH in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site RIH and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

bank swallow (*Riparia riparia*; CA-T); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC); least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E); San Diego desert woodrat (*Neotoma lepida intermedia*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2); many stemmed dudleya (*Dudleya multicaulis*; CA-1B.2)

Sensitive Communities Recorded within 1 Mile:

coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); San Diego woodrat (*Neotoma lepida intermedia*; CDFW-SSC); intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2);

Designated Critical Habitat Within 500 Feet:

coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

Los Angeles County General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Laurel sumac scrub [*Malosma laurina* Shrubland Alliance]; Association - *Malosma laurina*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site RIH is located on an isolated hill between the Puente Hills landfill and Rose Hills Memorial Park. The project area includes native and restored coastal sage scrub vegetation. The project area is within designated critical habitat for the coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC). At least one pair of gnatcatchers was known to nest in 2014 in the project area based on surveys associated with a Southern California Edison project. The project area is presumed occupied and additional surveys were not conducted. Coastal sage scrub vegetation and components of critical habitat primary constituent elements occur within and adjacent to the project site as well as throughout the project area. Riparian and streamside habitat

suitable for nesting bank swallows (*Riparia riparia*; CA-T) and least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E) are not present in the project area. The dense vegetation and varied topography of the project area result in unsuitable habitat for the burrowing owl (*Athene cunicularia*; CDFW-SSC). Potential habitat for the coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) occurs within the project area and individuals could be killed by project activities. Though not recorded by CDFW in the CNDDDB, the San Diego woodrat (*Neotoma lepida intermedia*; CDFW-SSC) was discovered in the project area during surveys for the California Edison project. Within the portion of the survey area that was not disturbed contains moderate quality habitat for intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2). Evidence of the woody flower/fruit stalks was not observed during the 9/11/2014 habitat assessment survey. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coastal California gnatcatchers (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; do not remove coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]). Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. No construction activities during the gnatcatcher breeding season. Stay on existing roads. Conduct protocol surveys for the gnatcatcher; if nesting is present within the project area limit construction activities to the non-breeding season. Manage trenches so as not to trap wildlife. Conduct spring botanical surveys for intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*; 1B.2); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Restrictions • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Critical habitat for coastal California gnatcatcher (*Poliophtila californica californica*; ESA-T, ESA-CH, CDFW-SSC) is within 500 feet of the project site.

Mitigation Measure(s):

Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection of Habitat • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The community plan is primarily concerned with trails and a wide range of recreational activities, minimizing future disturbance to native vegetation, increasing open space, maintaining SEA boundaries, determine fuel modification zones, develop hillside development standards, and maintaining a 50' buffer around riparian habitat. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Construction at Site RIH could result in removal of vegetation and human disturbance at each site and therefore could result in conflict with the Los Angeles County General Plan's Policy C/NR 3.1, which calls for conservation and enhancement of ecological function diverse natural habitats and biological resources. The site contains an existing tower facility, related infrastructure, and access road along with disturbed native scrub vegetation. The current use at the site is communications facility, and substantive removal of native vegetation is not expected. Construction and operations activities at the site do have the potential to impact biological resources, as described in Impact BIO 1. These impacts to resources conflict with Policy C/NR 3.1. Because a potential for significant impact associated with the resources protected by the Los Angeles County General Plan exists, this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 would reduce impacts from construction and operations to less than significant. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Protocol Surveys • BIO MM 14 Coastal

California Gnatcatcher Breeding Season Restriction • BIO MM 15 Southwestern Willow Flycatcher Protection • BIO MM 16 Snowy Plover Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Monarch Butterfly Protection • BIO MM 24 Prevent the Spread of Nonnative Vegetation • BIO MM 25 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Pliocene to Pleistocene Fernando Formation, which is known to be fossiliferous. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation at the nearby Puente Hills landfill. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Fernando Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Therefore, project activities would not disturb any human remains.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Soper-Fontana-Calleguas-Balcom-Anaheim Association

Erosion Potential: Low

Expansive Soil: Low to moderate potential

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by low angle to moderate slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site ranges from a well-drained gravelly loam to a clay loam with rapid runoff and moderately slow permeability. Moderate slopes surround the flat site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Malibu planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical

analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site RIH and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site RIH was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site RIH. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site RIH would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site RIH, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site RIH would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: One ENVIROSTOR and FUDS Site (Nike Battery 14) located less than 1/8 mile from Project Site

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: Yes

If yes, please explain: Puente Hills Landfill

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: Yes

If yes, please explain: Puente Hills Landfill

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC

plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open

areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Hacienda Heights Community Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: Yes

Trail Name: Located within 0.25 miles of Schabarum-Skyline Trail

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pomona Frwy

Distance (Miles): 0.75

Disaster Route: Workman Mill Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Site RIH is approximately 4.5 miles from El Monte Airport and more than 3 miles from various helipads

Nearest Highway/Freeway: Pomona Frwy

Distance (Miles): 0.83

Nearest Major Arterial: Workman Mill Rd

Distance (Miles): 1.01

Access to the Project Site Provided Via: Extension off of Canyon Drive

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site RIH is approximately 24,000 feet from El Monte Airport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, whip and microwave antennas mounted to a proposed 180-foot-tall monopole with an up to 15-foot-tall lightning rod), the TOWAIR tool indicates that the antenna structure is a “pass slope determination,” which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SDW

Site Name: San Dimas

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 310 Via Blanca

City: San Dimas

State: CA

Zip: 91773

Latitude: 34.0717455993

Longitude: -117.813688716

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

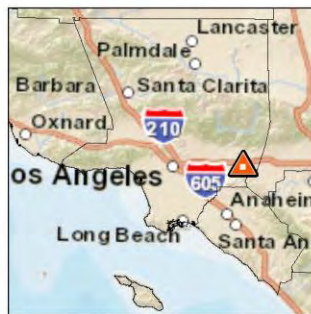
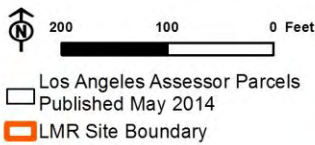
Existing Tower Type: Lattice (2)

Existing Tower Height: 100' each

Existing Site Use: Telecommunication Site/Water Tank

Existing Ground Elevation (feet AMSL): 1227

SDW Site Boundary Map



SDW

San Dimas
 310 Via Blanca
 San Dimas, CA 91773

Proposed New Site Coordinates (NAD83):

Latitude: 34.071669
 Longitude: -117.813583
 Elevation (Feet): 1223

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is on a hilltop and includes a small, sky-blue one-story windowless shelter and two tall thin red and white lattice towers connected with horizontal supports. The towers are approximately 120 feet tall. Two large microwave dishes are attached to a short monopole. The site occupies a small corner of a dirt area occupying approximately 0.8 acre and enclosed with a chain link fence. The site is located within a suburb adjacent to a major highway (Orange Freeway/Highway 57). Residences are large estates or triplexes/townhouses of a fairly homogenous design with landscaped lawns consisting of a variety of vegetation. A large expanse of undeveloped land separates the site from residences to the south, which are Mediterranean style 2-story duplexes. This subdivision is at a lower elevation than the site, making it a prominent vertical feature.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a suburban setting that is not within a scenic vista or within view of one.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed new facilities would be located within a site that includes an existing tower and water tank that have already altered the suburban landscape. Therefore, no impacts to visual character and quality would occur.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 193

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SDW. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SDW or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site SDW would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SDW will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SDW would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SDW or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SDW, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SDW, which is 193 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 10 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site SDW and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SDW in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SDW and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition,

the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

many-stemmed dudleya (*Dudleya multicaulis*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

coastal California gnatcatcher Critical Habitat (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

coastal California gnatcatcher (*Polioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

SEA - San Gabriel Valley (Buzzard Peak/San Jose Hills)

Local Policy or Ordinance for Biological Resources:

City of San Dimas General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ruderal/Coastal Sage Scrub

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site SDW is within the City of San Dimas and is located on a ridgeline overlooking Walnut Creek and adjacent to the I-10/I-215 interchange. The project site is situated at approximately 1,227 feet elevation. The site is fenced and has an asphalt driveway and cleared compacted soils. The site is surrounded on 3 sides by upscale housing developments. The down slope is part of the watershed for Walnut Creek which is dry most of the year at this location. Scattered vegetation on the site includes native narrow-leaf milkweed and common weeds such as wild oats (*Avena* sp), red-stemmed filaree (*Erodium cicutarium*), coyote melon (*Cucurbita foetidissima*), biennial mustard (*Hirschfeldia incana*), horehound (*Marrubium vulgare*), telegraph weed (*Heterotheca grandiflora*), and. A row of California pepper trees (*Schinus molle*) stands adjacent to an existing water tank on the site. The project area consists primarily of residential or other developed lands, in ruderal condition or planted with ornamental vegetation. The canyon and drainage to the south of the project site is the headwaters of Walnut Creek. The area has been impacted by development and past fires and is primarily composed of nonnative grasslands dominated by wild oats (*Avena* sp) and brome grasses (*Bromus* spp.) with California black walnut trees in the drainage

bottoms and scattered shrubs including Mexican elderberry and coast prickly pear (*Opuntia littoralis*). A few steep slopes and road cuts include scattered, small patches of remnant coastal sage scrub vegetation, composed largely of coast prickly pear but also includes sparse California sagebrush on the steepest slopes. A dense patch of coast prickly pear with elderberry (*Opuntia littoralis*-mixed coastal sage scrub community) is immediately down slope of the project site. The bottom of the canyon includes the headwaters of Walnut Creek. The canyon floor and adjacent side canyons contain walnut woodland. Designated critical habitat for coastal California gnatcatcher (*Poliioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC) is within the project area, as close as 100 feet from the fenced compound and potentially included within the projected project site. Critical habitat primary constituent elements are present in the project area; however, the closer to the developed facility the more degraded the habitat, with an increased presence of non-native species and active vegetation removal. No formal surveys for the gnatcatcher were conducted. The project area does not contain canyon habitat for the many-stemmed dudleya (*Dudleya multicaulis*; 1B.2); several locations for this plant occur on the other side of the freeway (0.25-miles to the east) near Puddingstone Lake. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coastal California gnatcatchers (*Poliioptila californica californica*; ESA-T, CDFW-SSC) in the project area, and the importance of maintaining coastal sage scrub vegetation. Minimize disturbance to natural vegetation; especially coastal sage scrub vegetation (e.g., California sagebrush [*Artemisia californica*], sage [*Salvia* spp], and Laurel sumac [*Malosma laurina*], and California buckwheat [*Eriogonum fasciculatum*]), and do not remove coastal sage scrub vegetation within designated critical habitat. Prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct protocol surveys for the gnatcatcher; if nesting is present within the project area limit construction activities to the non-breeding season. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

coastal California gnatcatcher Critical Habitat (*Poliioptila californica californica*; ESA-T, ESA-CH, CDFW-SSC) and the California walnut woodland sensitive community are within the study area.

Mitigation Measure(s):

Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Freshwater Forested/Shrub wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the East San Gabriel Significant Ecological Area. According to the Los Angeles General Plan, this SEA represents the only regional wildlife linkage between the San Gabriel Mountains and the Puente Hills and Chino Hills complex. It does not provide a continuous movement corridor, however, but provides for discontinuous patches of habitat, best suited for bird species. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No project-related policies within the City of San Dimas General Plan were identified, and there would be no impact to resources protected by the City of San Dimas General Plan from the proposed construction activities associated with Site SDW. As no project-related policies within the City of San Dimas General Plan were identified, no conflicts would occur, and there would be no impact from the proposed operations activities associated with resources protected by the City of San Dimas at Site SDW. Further, because the Authority is exercising intergovernmental immunity, the plan is not applicable and no conflict with the City of San Dimas General Plan exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in November 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Monterey Formation, which is known to be fossiliferous. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity, including the holotype of the fossil pipefish, *Syngnathus emeritus*. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Monterey Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical investigation

Soil Type: Soper-Fontana-Calleguas-Balcom-Anaheim Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained material ranging from gravelly to clayey loam with rapid runoff and moderately slow permeability. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the local city planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical

analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SDW and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SDW was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SDW. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SDW would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SDW, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SDW would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: Brackett Field Airport

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: Yes

If yes, please explain: Eastshore Recreational Vehicle is part of an NPL Site. EPA ID CAD983566712. Site is located 0.4 miles from Project Site.

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Yes, Very High Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site: Yes, private airstrip approximately 2 miles from Project Site

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste

transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site SDW lies within Area E land use as defined in the Airport Land Use Compatibility Plan (ALUCP) for Brackett Field. The approved Table 2A within the ALUCP indicates that structures more than 100 feet tall within the Area E land use need to be evaluated by the FAA to determine if the structure creates an air navigation hazard for the field. The proposed project would not create hazards to people residing in the project area, and notification FAA must be notified in accordance with 14 CFR Part 77. Prior to start of construction Form 7460-1 needs to be filed with the FAA. Filing of the form triggers the FAA to complete an aeronautical study and return a hazard determination.

Mitigation Measure(s):

HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a "Determination of No Hazard to Air Navigation."

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Site SDW is located approximately 1 mile from Puddingstone reservoir, although there is a deep valley between the site and the reservoir. Other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No, but the site is approximately 9,700 feet from Brackett Field

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: San Dimas

General Plan Designation: Single Family Residential Very Low

Zoning: Specific Plan 5

What is the zoning height restriction, if any?:

12 feet; 30 feet if designed as public art

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: San Dimas

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, such plans, policies, and regulations are not applicable to the project. Nevertheless, in the exercise of its discretion and in the interest in working cooperatively with local jurisdictions, local land-use plans, policies, and regulations are referenced, described, and addressed in recognition that such plans, policies, and regulations reflect the local community's policy decisions with respect to appropriate uses of land in the area. Consideration of these plans, policies and regulations, therefore, assists in determining whether the proposed project may conflict with nearby land uses, which could affect the analysis of whether the proposed project would result in potentially significant environmental impacts.

Based on the zoning ordinances for telecommunication facilities, the maximum allowable height of structures is 12 feet or 30 feet if designed as public art. Exceptions to the ordinance may be allowed, ordinarily with a conditional use permit. However, per the doctrine of intergovernmental immunity, the permit requirement is not applicable to the project. Because the Authority is exercising intergovernmental immunity, the City of San Dimas General Plan is not applicable and no conflict with the plan exists.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: San Dimas

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.36 Noise Ordinance

Noise Level Threshold: N/A; no construction from 8 pm to 7 am or any time on Sundays

ALUP or Within 2 Miles of Public Airport: Brackett Field Airport

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 50 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable" community noise equivalent level (CNEL) developed by the California Department of Health Services was

referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. Sensitive receivers (single-family dwellings) are located within 25 feet of Project site SDW; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site SDW, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if

no other alternatives are available.

- ☑ Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- ☑ Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

☑ Prior to commencement of construction aSite SDW, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime threshold. Such measures may include but are not limited to the following:

- ☑ Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- ☑ Use well-maintained equipment and have equipment inspected regularly.
- ☑ Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within the airport land use plan (ALUP) of a public airport (Brackett Field Airport). Ambient conditions near this site are dominated by aircraft noise and are within the 65 dBA CNEL noise contour identified by the ALUP. Site SDW would be located approximately 25 feet from the nearest noise-sensitive receiver. Construction noise at this site would occur during operation of the concrete saw and is estimated to be 89 dBA at this distance. The combined baseline 65 dBA CNEL and the temporary, short duration construction noise levels at receiver near site SDW would remain at 89 dBA, which is below the 90 dBA threshold where adverse community reaction could occur but would exceed the 80 dBA nighttime threshold. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, the site is not located in a jurisdiction with a noise ordinance that is applicable to the Authority. Therefore, construction of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from construction of the Project would be less than significant.

It is anticipated that operation of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Noise from maintenance activities, which includes an estimated 58 dBA at 21 feet during the monthly backup generator during testing, would not be substantially different from existing levels, except for new sites in rural locations, where ambient noise levels would be closer to 45 dBA, and would generally occur less than once per week during daytime hours between 7:00 am and 8:00 pm on weekdays, consistent with the City of San Dimas noise ordinance. Operation of the Project, including the HVAC system and emergency generator, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Orange Frwy

Distance (Miles): 0.65

Disaster Route: Interstate 210

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 9,700 feet from a runway at Brackett Field

Nearest Highway/Freeway: Corona Frwy

Distance (Miles): 0.19

Nearest Major Arterial: S San Dimas Ave

Distance (Miles): 0.38

Access to the Project Site Provided Via: Via Blanca

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site SDW is approximately 9,700 feet from a runway at Brackett Field. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 180-foot-tall lattice tower with an up to 15-foot-tall lightning rod), the TOWAIR tool indicates that the antenna structure is a “fail slope determination,” which indicates the structure could interfere with takeoff and landing operations, and would require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. The allowable height is 1 foot for every 100 feet of horizontal distance (a structure of about 97 feet in this case) when the proposal is for a 180-foot-tall lattice tower with a lightning rod extending up to 15 feet higher. The proposed construction may be allowed, but not without further coordination with FAA. If FAA approves the tower for construction, this would indicate that operation of the tower would not change air traffic patterns or result in substantial safety risks to flight operations.

Mitigation Measure(s):

HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460-1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.”

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: SOUTHERN CALIFORNIA W C

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SGH

Site Name: Signal Hill

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on existing 160 foot lattice tower to be extended to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 2321 Stanley Ave

City: Signal Hill

State: CA

Zip: 90755

Latitude: 33.7994555538

Longitude: -118.16287493

Jurisdiction:

Landowner: GTE California Inc.

Proposed LMR Facilities

Antenna Support Structure: Existing Lattice Tower to be Extended

New Support Structure Height: Extend from 160'to 180'

If Existing Structure is being used, is it FCC Registered?: Unknown

FCC Registration Number: Unknown

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice

Existing Tower Height: 160'

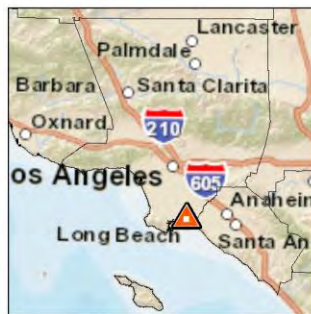
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 358

SGH Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
- Published May 2014
- LMR Site Boundary



SGH

Signal Hill
 2321 Stanley Ave.
 Signal Hill, CA 90755

Proposed New Site Coordinates (NAD83):
 Latitude: 33.799448
 Longitude: -118.162782
 Elevation (Feet): 355

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



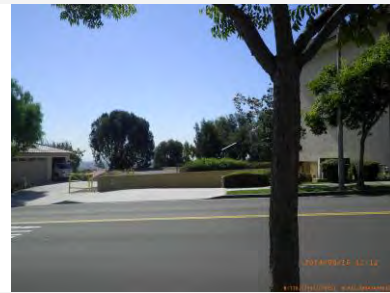
Site view looking north



Surrounding area north of site

PHOTO NOT AVAILABLE

Site view looking south



Surrounding area south of site



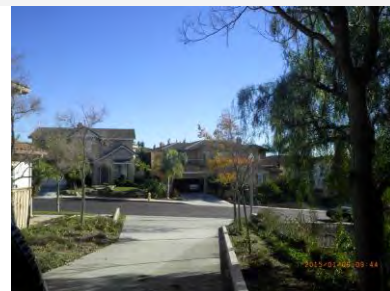
Site view looking east

PHOTO NOT AVAILABLE

Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is located on a hilltop within a gated residential community. The site consists of an elongated concrete surface that occupies approximately two of the residential lots and is enclosed by a high concrete wall. An L-shaped 2-story windowless equipment room with a sloped green tile roof is on the west side of the site. A 160-foot tall red and white lattice tower with several attached microwave dishes is in the center of the site. A tree-lined concrete driveway provides access on the east side. Single-family residences directly abut the site on the north and west; their back yards end at the site's boundary wall. The existing 160-foot lattice tower is located within a matter of feet from the closest residence. A similar site, which occupies a slightly larger area and includes three small shelters and a very large lattice tower with attached microwave dishes is located immediately to the south and is adjacent to the Signal Hill site. An oil drilling rig is directly east of and adjacent to this other site. Both lattice towers are the most obvious and dominant visual feature due to their height, bulk, and hilltop location, and their obvious dissimilarity with the surrounding residences. The surrounding residences are large 2-story houses on relatively small lots and comprise the majority of the surrounding area. A trail system is at the far north and extends to the western and eastern end of the 0.25-mile radius. Larger, 2-story estate-like houses on small lots occupy the southeastern area, and 2- to 4-story multi-family residences occupy the eastern area. Most of the residences are designed in a Mediterranean style with buff-colored stucco facades and red tile roofs. Lawns are small but landscaped with grass, shrubs, and relatively small trees of various species. A small park (Sunset View Park) is south of the site and provides views of the distant horizon to the south. This elongated park parallels a road and consists of low grasses and shrubs, concrete benches, and a concrete path. An oil drilling rig occupies the equivalent of a residential lot immediately adjacent to three residences southeast of Sunset View Park. A larger, circular shaped park (Hilltop Park) is to the west of the area, which includes covered picnic tables, a lawn, and rows of broadleaf and deciduous trees planted in a semi-circle around a circular concrete path. This park also provides broad, distant views to the south. An oil drilling rig is immediately adjacent to the park's entrance

Visual Sensitivity: Medium

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: Hilltop Park, Sunset View Park

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a highly developed suburban setting. Scenic vistas from Hilltop Park and Sunset View Park are toward the south, facing the Pacific Ocean and away from the built environment that includes the site's location.

Tall palm trees that ring the eastern side of Hilltop Park help obscure views of the existing towers at the site if looking east. Any viewers looking north from Sunset View Park would see two- to four-story houses, mature vegetation, and an oil rig that would help block views of the site, although the existing towers would be visible from the northwestern corner of the park. However, the scenic vistas are to the south. Adding new antennas to the existing lattice tower and extending it 20 feet would not interfere with any scenic views.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Microwave and whip antennas would be mounted to the existing 160-foot lattice tower, which would be extended an additional 20 feet. The existing lattice tower, adjacent lattice tower, and oil rig have already altered the character and quality of this dense suburban neighborhood. The new antennas would be barely noticeable, as would the additional 20 feet to the 160-foot tower.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 95

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SGH. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SGH or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site SGH would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SGH will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SGH would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SGH or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SGH, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SGH, which is 95 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 4 are higher than the SCAQMD thresholds for NO_x, lower for CO, PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site SGH and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SGH in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SGH and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Signal Hill General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site SGH is located on a broad hilltop surrounded by residential and commercial development with mature landscaping, paved roads, and a small urban park and oil well pumps in the general vicinity. No natural habitats are present in the project area; no habitats for special status species of wildlife or plants are present in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The city of Signal Hill no longer contains native vegetation and does not contain habitat for sensitive species. Most vacant land with ruderal vegetation is involved in oil production. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Signal Hill General Plan does not include policies to protect biological resources.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). Within the indirect APE there is one historical resource (Resource No. P-19-179272), which is California Historical Landmark No. 580 (Alamita Oil Well 1). This resource is situated approximately 1,500 feet from the direct APE and well beyond line-of-sight of the direct APE due to distance and the intervening urban landscape. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. LMR construction at this project location includes the attachment of whip and microwave antennas on an existing 160-foot lattice tower, extended to 180 feet. Indoor equipment will be located in an existing equipment shelter and a proposed backup generator and fuel tank will be located on a concrete pad. Based on the distance of the identified historical resource from the direct APE, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The area is mapped as Quaternary older alluvium, which has a moderate potential for significant vertebrate fossils from the late Pleistocene. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this geologic unit in the vicinity. Recovered fossils include mammoth and bird material from unspecified depth. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Quaternary older alluvium to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Sorrento-Hanford Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1/8 of a mile south of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas and support structure would be collocated to existing lattice structure, therefore a geotechnical study for new structures is not required. Proposed whip and microwave antennas would be attached to the existing tower. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Existing structures were built in accordance with current UBC and CBC at the time of

construction. Therefore, the effects of seismic shaking would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Signal Hill planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no impact on the project. The site is located in an urban area and antenna are to be located on an existing lattice tower. The tower is proposed to be extended from 160 to 180 feet in eight. No new structures would be built to support the antenna. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SGH and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SGH was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SGH. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SGH would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SGH, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SGH would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: Long Beach Airport is within two miles. Site SGH is not within the ALUP boundary of this airport.

Private Airport in Vicinity: St Mary Medical Center

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR less than 1/4 from Envirosstor Site, Brownfield site less than 1/2 mile, one closed LUST site less than 1/8 mile away, one CERCLIS-NFRAP site less than 1/2 mile, and two RCRA corrective action sites less than one mile.

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: Yes

If yes, please explain: 13 gas and oil wells within 200 FT of LMR Site Boundary

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste

transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Coastal Plain Of Los Angeles

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If

runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No, but the site is approximately 4,600 feet from Long Beach Airport

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Signal Hill

General Plan Designation: Low Density Residential

Zoning: Hilltop Specific Plan District

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Signal Hill

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site

assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Signal Hill

Applicable Noise Ordinance: Title 9 Public, Peace, Morals and Welfare, Chapter 9.16 Noise

Noise Level Threshold: N/A; no construction from 6 pm to 7 am on weekdays or at any time on weekends and holidays

ALUP or Within 2 Miles of Public Airport: Long Beach Daugherty Field Airport

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 55 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: Multi-family Residential Dwellings

Sensitive Noise Receiver 3: Sunset View Park

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. Sensitive receivers (single-family dwellings) are located within 25 feet of Project site SGH; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site SGH, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.

- ☑ Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- ☑ Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

☑ Prior to commencement of construction at SGH, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime threshold. Such measures may include but are not limited to the following:

- ☑ Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- ☑ Use well-maintained equipment and have equipment inspected regularly.
- ☑ Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within two miles of a public airport (Long Beach Daugherty Field Airport), but outside of the 65 dBA CNEL developed by the airport land use plan. Estimated construction noise levels for all other proposed Project sites would be below the 90-dBA FTA threshold where adverse community reaction could occur during daytime hours but would exceed the 80-dBA nighttime threshold. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, this proposed Project location is not located in a jurisdiction with a noise ordinance that is applicable to the Authority. Therefore, it is anticipated that construction of this site would not expose people to excessive noise levels. Impacts from construction of the Project would be less than significant.

After construction, the site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Noise from maintenance activities, which includes an estimated 58 dBA at 21 feet during the monthly backup generator during testing, would not be substantially different from existing levels, except for new sites in rural locations, where ambient noise levels would be closer to 45 dBA, and would generally occur less than once per week during daytime hours between 8:00 a.m. and 6:00 p.m. On weekdays, consistent with the City of Signal Hill noise ordinance. Operation of the Project, including the HVAC system and emergency generator, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: State Route 1

Distance (Miles): 0.39

Disaster Route: Cherry Avenue

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 4,600 feet from a runway at Long Beach Airport

Nearest Highway/Freeway: Interstate 405

Distance (Miles): 0.65

Nearest Major Arterial: Cherry Ave

Distance (Miles): 0.25

Access to the Project Site Provided Via: Stanley Avenue

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site SGH is approximately 4,800 feet from a runway at Long Beach Airport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on an existing 160-foot lattice tower that is to be extended to 180 feet tall with an up to 15-foot-tall lightning rod), the TOWAIR tool indicates that the antenna structure is a “fail slope determination,” which indicates the structure could interfere with takeoff and landing operations, and would require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. The allowable height is 1 foot for every 100 feet of horizontal distance (a structure of about 46 feet in this case) when the proposal is for a 180-foot-tall lattice tower with a lightning rod extending up to 15 feet higher. The proposed construction may be allowed, but not without further coordination with FAA. If FAA approves the tower for construction, this would indicate that operation of the tower would not change air traffic patterns or result in substantial safety risks to flight operations.

Mitigation Measure(s):

HAZ MM 2: Prior to issuance of building permits, the Contractor shall submit Form 7460–1 (Notice of Proposed Construction or Alteration) to the FAA, in the form and manner prescribed in 14 CFR part 77. The Contractor shall also provide documentation to the appropriate city or county planning agency demonstrating that the FAA has issued a “Determination of No Hazard to Air Navigation.”

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF SIGNAL HILL

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SIM

Site Name: Simpsons' Building

Site Discussion:

Propose installation of up to 20 whip and up to 7 microwave antennas on roof top of existing building without exceeding current overall height of the structure including appurtenances. Propose indoor equipment racks to be located in room in existing building, or in a new up to 600 square foot shelter on building roof, or up to 600 square foot shelter on adjacent grounds (prefab or CMU). Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank adjacent to the building.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 100 cubic yards removed

Proposed trenching for underground conduits to accommodate power and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide

Proposed foundations include:

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Building 42, Fox Lot, 10201 West Pico Blvd

City: Los Angeles

State: CA

Zip: 90064

Latitude: 34.1398058609

Longitude: -118.353771927

Jurisdiction:

Landowner: Universal Studios, LLC

Proposed LMR Facilities

Antenna Support Structure: Rooftop

New Support Structure Height: N/A

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

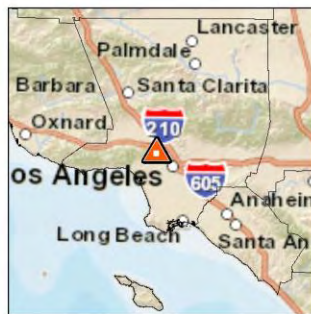
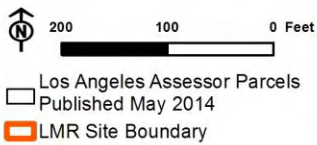
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: Commercial Building

Existing Ground Elevation (feet AMSL): 764

SIM Site Boundary Map



SIM

Simpsons' Building
 Building 42, Fox Lot, 10201 West Pico Blvd.
 Unincorporated, CA 91608

Proposed New Site Coordinates (NAD83):

Latitude: 34.139938
 Longitude: -118.353892
 Elevation (Feet): 714

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



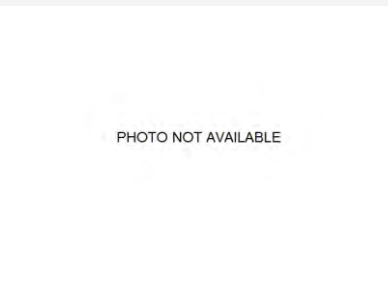
Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is located on the roof of a building in Universal Studios, Los Angeles. No obvious towers or other fixtures are visible. The building houses the ride for Krustyland, a theme park ride based on the Simpsons animated television show. The windowless, angular terraced building is approximately five stories tall and painted a vivid cobalt blue. Red decorative designs and illustrations are attached to a depiction of the ride on a freestanding structure on the 3rd story terrace. Bright red metal supports extend from the front of the building (similar to flying buttresses) and are topped with colored metal flags. The site is within a theme park with a carnival-like atmosphere in a visually distracting and chaotic setting. A giant clown face signals the entrance to the ride complex. Carnival lights and brightly painted games flank the entrance. The ground is painted with vivid colors and starbursts. Several outdoor picnic tables and umbrellas are clustered in groups around the plaza area. A few deciduous trees are planted throughout the plaza. Various restaurants and other attractions in the plaza have various theme-based designs. Similar large buildings that house rides are scattered throughout the area. The theme park is concentrated primarily on the southern half of the 0.25-mile radius. A wide, undeveloped corridor of grass and deciduous trees follows a curvilinear path east-west directly north of the site. Large parking areas and other buildings are north of that. The site is most readily visible from the open plaza area. Other rides, games, buildings, and trees obstruct the site from farther vantage points.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in an amusement theme park that is not within a scenic vista or within view of one.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Microwave and whip antennas would be mounted to a ballast frame, and whip antennas would be mounted inside a parapet on the roof of an existing 55-foot tall building. There would be no new permanent disturbance. The visual character of the site is an amusement theme park with a carnival-like atmosphere and a visually distracting and chaotic setting. A giant clown face signals the entrance to the ride complex. Carnival lights and brightly painted games flank the entrance. The ground is painted with bright colors and starbursts. The new antennas would be largely unnoticeable and would not conflict with the amusement park character and quality of the setting.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. The site is in an urban area. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Commercial building

Distance to Sensitive Receptor: 135

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SIM. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SIM or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site SIM would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SIM will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SIM would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SIM or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SIM, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SIM, which is 41 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, lower for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site LST and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SIM in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SIM and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

pallid bat (*Antrozous pallius*; CDFW-SS); western pond turtle (*Emys marmorata*; CDFW-SS)

Special Status Plants Recorded within 1 Mile:

Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1); mesa horkelia (*Horkelia cuneata* var *puberula*; 1B.1); Parish's brittlescale (*Atriplex parish*; 1B.1);

Sensitive Communities Recorded within 1 Mile:

California Walnut Woodland; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

Los Angeles County General Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site SIM is located in an urban setting at Universal Studios. Landscape vegetation in the area includes ornamental trees and shrubs, with interspersed native California black walnut trees (*Juglans californica*). Adjacent to the project area a 7-story building is under construction. No natural habitats are present in the project area; no habitats for special status species of wildlife or plants are present in the project area. Roof-top mount.

Mitigation Measure(s):

None required.

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. The California walnut trees present within the landscaped environment do not function as a natural vegetation community.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Freshwater Pond wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not have the potential to conflict with the Los Angeles County General Plan. Policies C/NR3.1, C/NR 3.8, and C/NR 3.9 of the plan promote protection of biological resources and encourage site sensitive design in settings where sensitive biological resources occur. The site is urbanized, however, and the surrounding area is highly developed and there is no potential for sensitive natural resources to occur on site. No conflict with local policies or ordinances exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). The direct APE consists of the Simpsons' Building itself, which was built in 1993 and, based on archival research and field survey, is not a historical resource. There is also a small area adjacent to the building that is largely paved parking surrounded by mature trees. Within the indirect APE there are two historical resources. Resource No. P-19-187794 (HPD 033713) is the Universal Studios Historic District that is situated approximately 500 feet north of the direct APE. The second, Resource No. P-19-001945 is the National Register of Historic Places (National Register)-listed Campo de Cahuenga, a commemorative historical site which encompasses the Feliz Adobe (a reconstruction) and Fremont-Pio Memorial Park, all of which is associated with the signing of the Articles of Capitulation ending the Mexican-American War; there is also a high probability that this location encompasses prehistoric remains that represent the Native American village of Cahuenga. The site is also California Historical Landmark No. 151. Campo de Cahuenga is situated at the western-most boundary of the indirect APE (0.5 mile) and well beyond line-of-sight of the SIM project location due to distance and the intervening urban landscape. LMR construction at this project location includes the installation of whip and microwave antennas on the roof of the SIM building where they would not be visible at ground level; construction of a new equipment shelter; and installation of a new backup generator and fuel tank on a concrete pad. None of these LMR construction activities will have an adverse direct or visual effect on historical resources. This was confirmed through archival research and during a field survey of the direct APE conducted by an SOI-qualified archaeologist in January 2015. Based on the distance between the

identified resources and the direct APE, there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is one historical resource (archaeological) within the indirect APE. The Resource No. P-19-001945 is the National Register of Historic Places (National Register)-listed Campo de Cahuenga, a commemorative historical site that encompasses the Feliz Adobe (a reconstruction) and Fremont-Pio Memorial Park, all of which is associated with the signing of the Articles of Capitulation ending the Mexican-American War. There is also a high probability that this location encompasses prehistoric materials associated with the Native American village of Cahuenga. Campo de Cahuenga is situated at the western-most boundary of the indirect APE, 0.5 miles from the direct APE, and well outside the construction impact area for this project location. Based on the distance between the identified resources and the direct APE, there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Topanga Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include the extinct four-legged mammal Desmostylia, smelt, codlets, boarfish, herring, cod, bigeyes croaker, and mackerel. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within the direct areas of potential effects (APE) and the project location is not sensitive for them. Although there is high probability that prehistoric materials are associated with the Native American village of Cahuenga, based on the distance between this resource and the direct APE (0.5 mile),

there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct area of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs; however, additional archival research indicates that there may be prehistoric materials associated with the Native American village of Cahuenga. Campo de Cahuenga is situated at the western-most boundary of the indirect APE, 0.5 mile from the direct APE, and well outside the construction impact area for this project location. Based on the distance between the identified resources and the direct APE, there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Lithic Xerorthents-Hambright-Castaic Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or other geologic hazards would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site has a mix of shallow, well drained stony loam to silty clay loam. This soil type exhibits a medium to very rapid runoff with moderately slow permeability, resulting in moderate erosion resistance. Moderate slopes surround the site. Grading, excavation, and other construction activities associated with the implementation of the proposed project could cause erosion due to exposed soils. Building permits require that standard BMPs for erosion control be put in place on all projects. There would be no ground disturbing activities associated with the operation of the LMR facility.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located in an urban area and antenna are to be located a the roof of existing building. No new structures would be built to support the antenna. Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards, such as land spreading prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or other geologic hazards would be no impact.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SJM and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SJM was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SJM. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SJM would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SJM, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SJM would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: NBC-TV Heliport

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: Yes

If yes, please explain: Less than 1/2 mile from Site on Final NPL. Site is Area 2 (EPA ID CAD980894901) associated with groundwater contamination (VOCs and solvents).

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR Site is within 1/4 mile of 1 permitted UST, one active LUST site, one closed Cortese LUST site, and one VCP is ongoing.

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: Yes

If yes, please explain: Universal City Industrial Waste Disposal Facility

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or

releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open

areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If

runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No, but the site is approximately 19,600 feet from Bob Hope Airport

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Specific Plan

Zoning: Specific Plan

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing building and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Hollywood Frwy

Distance (Miles): 1.27

Disaster Route: Highway 101

Transit, Bicycle, or Pedestrian Facilities: Located within 0.25 miles of the LA Metro Rail

Within Vicinity of Aviation Facility: Approximately 19,600 feet from Bob Hope Airport

Nearest Highway/Freeway: Hollywood Frwy

Distance (Miles): 0.39

Nearest Major Arterial: Lankershim Blvd

Distance (Miles): 0.38

Access to the Project Site Provided Via: Universal Hollywood Drive to Production Plaza

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site SIM is approximately 19,600 feet from Bob Hope Airport. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered, the TOWAIR tool indicates that the antenna structure (in this case, antennas mounted on the roof of an existing building) meets the 6.10-meter (20-foot) rule criteria. This means that FAA notification is not required if the antenna structure is 6.10 meters (20 feet) or less in height, unless the antenna structure would increase the height of another antenna structure. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: City of Burbank Landfill #3

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF LOS ANGELES

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SPN

Site Name: Saddle Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 24574 W. Saddle Peak Rd

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0755956575

Longitude: -118.660000124

Jurisdiction:

Landowner: American Tower

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (2) adjacent; more lattice towers are in vicinity

Existing Tower Height: 180'; unknown

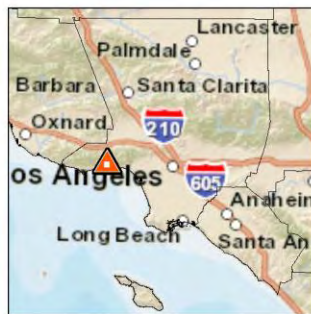
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3255

SPN Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



SPN

Saddle Peak
24574 W. Saddle Peak Rd.
Malibu, CA 90265

Proposed New Site Coordinates (NAD83):

Latitude: 34.075598
Longitude: -118.659946
Elevation (Feet): 2776

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in the Santa Monica Mountains National Recreation Area and is located off Saddle Peak Road near the intersection with Piuma Road and Schueren Road on a ridgeline designated by Los Angeles County as “significant.” The site is also located in proximity to the Backbone Trail. The Backbone Trail contours along the ridgeline to the north of the site and provides views of it. The Backbone Trail is a Santa Monica Mountains ridgeline trail that follows ridges, traverses chaparral-covered hillsides, enters oak woodlands, and crosses creeks and valleys in the Santa Monica Mountains National Recreation Area. Trail development has occurred piecemeal across a patchwork of public lands, and therefore has different names in some sections, and not all sections are open to all users. The site is part of a large compound of similar sites. The single site consists of several lattice towers of varying heights, including one 150-foot tower, a utility pole with transformer, two one-story buildings, and associated equipment enclosed by a chain link fence and concrete wall. The site is above a low-density neighborhood of estate houses to the west. Chaparral vegetation is denser to the northwest, where the houses are located, and more scattered and drier to the southwest. Dominant views include the ridgeline, highway, and telephone lines. Primary sensitive viewers include NRA visitors.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Backbone Trail

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: adjacent to Malibu Creek State Park

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a designated significant ridgeline and is within view of some sections of the Backbone Trail. The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes several existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from

the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of a large compound comprised of existing buildings and towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 730

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SPN. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SPN or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site SPN would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SPN will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SPN would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SPN or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SPN, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SPN, which is 730 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site SPN and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SPN in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SPN and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet);

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS); SEA/CRA - Santa Monica Mountains (Buffer B5); SCAG Zoning - Wildlife Preserves & Sanctuaries (Malibu Coastal Zone)

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Birch leaf mountain mahogany chaparral [*Cercocarpus montanus* Shrubland Alliance]; Association - *Cercocarpus montanus*-*Artemisia californica*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site SPN is located within an existing complex of communication facilities on Saddle Peak, high in the Santa Monica Mountains. The project area is within the montane chaparral vegetation community. The north-facing slopes contain mountain mahogany (*Cercocarpus montanus*), chamise (*Adenostoma fasciculata*), scrub oak, toyon (*Heteromeles arbutifolius*), and manzanita. The south-facing slopes contain laurel sumac (*Malosma laurina*), and bush buckwheat (*Eriogonum fasciculatum*). American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass by the site while foraging, but the project area does not provide steep cliff habitat required for nesting.

California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC) and coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) could occur in the project area and could be killed project activities. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica National Recreation Area to occur within 1 mile of Site SPN at an unspecified location within Cold Creek Nature Preserve. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. Monarch butterfly (*Danaus plexippus*; ESA-Pet) may pass through the area on migration, but no tall trees are present within the project area that may serve as potential roosts. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC), California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC), and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 WEAP
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 17 Raptor Protection
- BIO MM 18 Nesting Bird Protection
- BIO MM 19 Trenches and Holes Management
- BIO MM 21 Protected Amphibian Protection
- BIO MM 23 Prevent the Spread of Nonnative Vegetation
- BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. Site SPN may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site SPN is comprised solely of H3 habitat. The study area for Site SPN contains H2 habitat and H1 Quiet Zone. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Impacts to resources at the site are described in Impact BIO 1 and Impact BIO 2. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 Worker Environmental Awareness Program
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 6 Anti-perch Devices
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 12 Coastal California Gnatcatcher Protection
- BIO MM 17 Raptor Protection
- BIO MM 18 Nesting Bird Protection
- BIO MM 19 Trenches and Holes Management
- BIO MM 21 Protected Amphibian Protection
- BIO MM 22 Monarch Butterfly Protection
- BIO MM 23 Prevent the Spread of Nonnative Vegetation
- BIO MM 24 Special Status Plants Surveys and Protectio

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). The direct APE encompasses an existing communications site that consists of multiple lattice towers and associated infrastructure features and paved roads and parking areas. Within the indirect APE, there is one archaeological site (P-19-004322) that is situated approximately 1,330 feet from the direct APE. The site consists of two adjacent rockshelters that may have prehistoric components, but is primarily thought to be of historic age and displays a 1913 inscription. During a field survey in October 2014, a third rockshelter was noted as well as a small lithic scatter. LMR construction at this project location includes the attachment of whip and microwave antennas on a proposed 180-foot lattice tower; construction of a new equipment shelter; and installation of a backup generator and fuel tank on a concrete pad. Given the distance of the archaeological site from the direct APE, there will be no adverse impacts from LMR construction. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the distance between the direct APE and the identified archaeological resources, there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. The archaeological site at this location is approximately 1,330 feet from the direct APE. Given the distance between the direct APE and the identified archaeological resources, there would be no direct or indirect impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Miocene Topanga Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the vicinity. Recovered fossils include carnivores, horses, camels, deer, and rodents. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Topanga Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Archival research and field survey at this project location identified an archaeological site approximately 1,330 feet from the direct APE; however, it is well outside the construction impact area. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained, light clay loam with light clay loam low to very high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard

has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SPN and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SPN was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SPN. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SPN would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SPN, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SPN would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Los Angeles County Fire Department Camp 8 Heliport

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site: Yes, Los Angeles County Fire Department Camp 8 Heliport is 1.2 miles from Project Site

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste

transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

The proposed project would not violate any water or waste water standards during construction or operation. There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed

as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Mountain Lands (RL20)

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site SPN is proposed along an adopted Significant Ridgeline within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Per the Local Implementation Plan adopted in 2014, new development is prohibited on Significant Ridgelines. Structures must be located sufficiently below Significant Ridgelines so that the highest point of a structure is located at least 50 vertical feet and 50 horizontal feet from a Significant Ridgeline. The proposal is to establish a 180-foot-tall tower at an existing communications facility, thus expanding the existing facility. This would result in

a conflict with the Santa Monica Mountains Land Use Plan.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles): 4.41

Disaster Route: Malibu Canyon Road

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Us Highway 101

Distance (Miles): 2.47

Nearest Major Arterial: Mulholland Hwy

Distance (Miles): 1.68

Access to the Project Site Provided Via: Extension off of W. Saddle Peak Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: LAS VIRGENES MUNI W DIST

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SUN

Site Name: Sunset Ridge

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest

City: Above Claremont

State: CA

Zip: 91711

Latitude: 34.1880890032

Longitude: -117.70505827

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (4); Monopole (1)




Existing Tower Height: Lattice 60', 81', 84', 120'; Monopole 20'

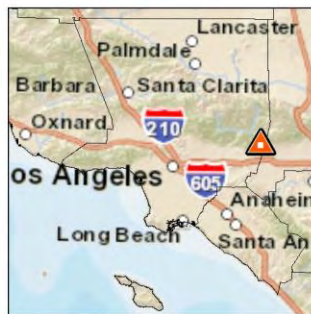
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5256

SUN Site Boundary Map



-  200 100 0 Feet
-  Los Angeles Assessor Parcels
Published May 2014
-  LMR Site Boundary



SUN

Sunset Ridge
Angeles National Forest - 1N08.1 Browns Flat
Unincorporated, CA 91750

Proposed New Site Coordinates (NAD83):

Latitude: 34.188084
Longitude: -117.704902
Elevation (Feet): 5263

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



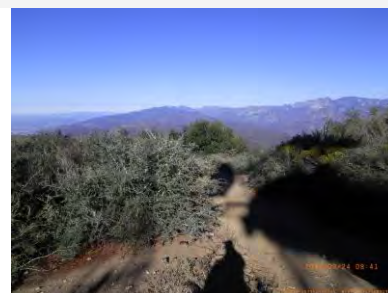
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located in Angeles National Forest on a ridge top west of Mount Baldy Road in a cleared area surrounded by chaparral vegetation. The site includes four existing lattice towers of unknown heights, a transformer, two small one-story buildings, and associated equipment enclosed within a chain link fence. Various types of antennas are attached to each tower. Vegetation within and around the site has been cleared and the surface is dirt. Steep topography blocks views of the site from Mount Baldy Road. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Experimental Forest, which is generally closed to the public except by permit. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Experimental Forest

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the proposed new facilities would be located within a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result

in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of existing buildings and towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. There would be no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 792

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SUN. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SUN or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site SUN would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SUN will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SUN would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SUN or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SUN, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SUN, which is 792 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 10 are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site SUN and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SUN in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SUN and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

Greata's aster (*Symphotrichum greatae*; 1B.3); Hall's monardella (*Monardella macrantha* ssp. *Hallii*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Canyon Live Oak Ravine Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service -Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga; Natural Landscape Block - San Dimas

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Interior live oak chaparral [*Quercus wislizenii* Woodland Alliance]; Association - *Quercus wislizenii*-*Ceanothus leucodermis*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Sunset Ridge is located along a high ridgeline in the San Gabriel Mountains. The vegetation is dominated by scrub oak and is recovering from a fire. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in San Antonio Canyon, about 1.5 miles to the west of Site SUN. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-

related construction activities and travel on access roads could impact dispersing frogs, if present. Site SUN is not hydrologically connected to San Antonio Canyon. The site does not contain stream habitat for Greata's aster (*Symphytotrichum greatae*; 1B.3). Jeffery pine forest habitat for Hall's monardella (*Monardella macrantha* ssp. *hallii*; 1B.3) is not present in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. The site does not contain Canyon Live Oak Ravine Forest.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory

(USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Dimas Natural Landscape Block which overlaps the ranges of approximately 272 amphibian, reptile, mammal and bird species. It is also located within an Essential Connectivity Habitat Area Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga that connects to the San Gabriel/Cucamonga and Lytle Creek Ridge Natural Landscape Blocks. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations SUN and SUN2 are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by P-19-186535; P-19-187829 encompasses the direct APE and three fourths of the indirect APE. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. There is also one additional recorded resource within this project location's indirect APE. Resource No. P-19-186918 (FS-

05015200101-HIS) is a segment of Forest Service Road 2N07, (the Sunset Ridge Fire Road/Sunset Peak Mountain Way), which was first recorded as a trail in 1924 and improved to a vehicle road by 1942. The road crosses the southeastern area of the indirect APE running northeast/southwest and is approximately 1,100 feet from the indirect APE at its closest point. The route of this road, as opposed to its physical surface, is considered historic and the road is a U.S. Forest Service Heritage Resource, but not an eligible or listed historical resource; therefore there would be no impacts from project activities on Resource No. P-19-186918 (FS-05015200101-HIS). LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower, a new equipment shelter and fuel tank mounted on a concrete pad, and extension of an existing chain link fence. There is existing communications equipment at this location and at other adjacent communications-related sites situated within between 800 and 1,800 feet of the direct APE. The sites include multiple lattice towers, equipment shelters, and associated infrastructure features. Construction of an additional tower at this project location would be in keeping with the existing communications/industrial landscape, including the presence of other towers within the immediate/adjacent environment. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the nature of this site and the identified resources at this project location, impacts from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations SUN and SUN2 are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by P-19-186535; P-19-187829 encompasses the direct APE and three fourths of the indirect APE. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829, the small footprint of the project site, and the lack of any uniquely definable associated resource features at this proposed project site, impacts would be less than significant. There is also one additional recorded resource within this project location's indirect APE. Resource No. P-19-186918 (FS-05015200101-HIS) is a segment of Forest Service Road 2N07, (the Sunset Ridge Fire Road/Sunset Peak Mountain Way), which was first recorded as a trail in 1924 and improved to a vehicle road by 1942. The road crosses the southeastern area of the indirect APE running northeast/southwest and is approximately 1,100 feet from the indirect APE at its closest point. The route of this road, as opposed to its physical surface, is considered historic and the road is a U.S. Forest Service Heritage Resource, but not an eligible or listed historical resource; therefore there would be no impacts from project activities on Resource No. P-19-186918 (FS-05015200101-HIS). LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower, a new equipment shelter and fuel tank mounted on a concrete pad, and

extension of an existing chain link fence. There is existing communications equipment at this location and at other adjacent communications-related sites situated within between 800 and 1,800 feet of the direct APE. The sites include multiple lattice towers, equipment shelters, and associated infrastructure features. Construction of an additional tower at this project location would be in keeping with the existing communications/industrial landscape, including the presence of other towers within the immediate/adjacent environment. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the nature of this site and the identified resources at this project location, impacts from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian igneous and metamorphic rock complex

Stability: Moderate to high pending geotechnical analysis

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1.25 miles southeast of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of material ranging from well-drained silty loam to gravelly loam with low to very high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SUN and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SUN was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SUN. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SUN would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SUN, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SUN would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Experimental Forest

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Experimental Forest. The Experimental Forest zone serves as a research and demonstration area, and is generally closed to the public except by permit. Access is controlled. The San Dimas Experimental Forest (SDEF) is a protected field laboratory for studies of hydrology, fire, and other topics relating to the ecology of chaparral and related ecosystems. It has been closed to the general public, except under special written permit. Uses within the SDEF include a communications site that was authorized by special-use authorization (USFS, Pacific Southwest Region 2005b).

Communications sites may be permitted within the SDEF, but would require special-use authorization. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. Compatibility of the proposed land use is further evaluated through the permit application process. No land use plan incompatibility impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Development of communication facilities at the site could result in the loss of forest land or conversion of forest land to non-forest use, but losses would be minimal as the site has been previously developed. Minimal impacts would be expected based on the presence of existing communications facilities, other developments, access roads, and ground disturbance.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Experimental Forest land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Sunset Ridge is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 4.41

Disaster Route: State Route 210

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 4.41

Nearest Major Arterial: Mount Baldy Rd

Distance (Miles): 1.52

Access to the Project Site Provided Via: Extension off of Sunset Peak Mtwy

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: SUN2

Site Name: Sunset Ridge-2

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Angeles National Forest

City: Above Claremont

State: CA

Zip: 91711

Latitude: 34.1880362744

Longitude: -117.704741048

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

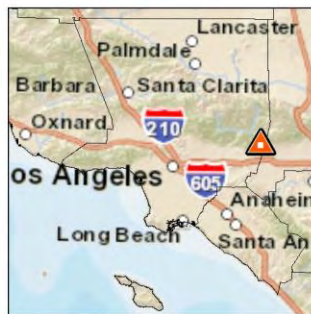
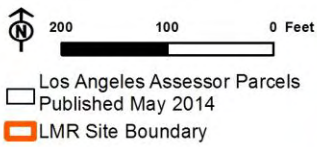
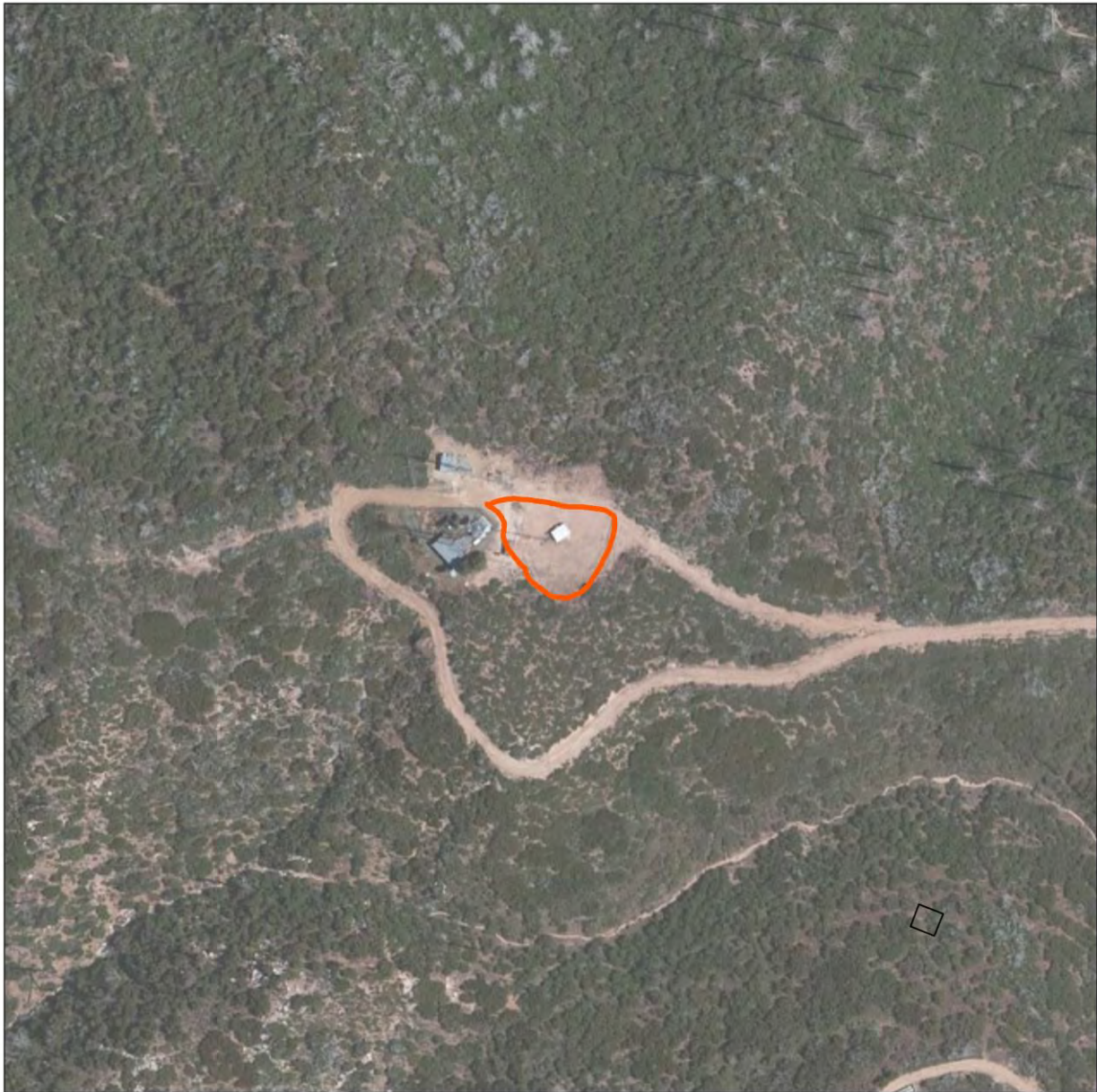
Existing Tower Type: Lattice (4); Monopole (1)

Existing Tower Height: Lattice 60', 81', 84', 120'; Monopole 20'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 5262

SUN2 Site Boundary Map



SUN-2

Sunset Ridge-2
Angeles National Forest - 1N08.1 Browns Flat
Unincorporated, CA 91750

Proposed New Site Coordinates (NAD83):

Latitude: 34.188036
Longitude: -117.704741
Elevation (Feet): 5255

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is immediately adjacent to the Sunset Ridge site, and the same conditions apply. This isolated site is located in Angeles National Forest on a ridge top west of Mount Baldy Road in a cleared area surrounded by chaparral vegetation. The site is comprised of a large dirt parking area and one small shelter with adjacent monopole. Steep topography blocks views of the site from Mount Baldy Road. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Experimental Forest, which is generally closed to the public except by permit.

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Experimental Forest

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located immediately adjacent to a site that includes existing towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of existing buildings and towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. There would be no change to the site's scenic attractiveness rating. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Industrial building

Distance to Sensitive Receptor: 790

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site SUN2. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site SUN2 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site SUN2 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site SUN2 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site SUN2 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site SUN2 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site SUN2, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site SUN2, which is 790 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 4 are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site SUN2 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site SUN2 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site SUN2 and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

Greata's aster (*Symphotrichum greatae*; 1B.3); Hall's monardella (*Monardella macrantha* ssp *hallii*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Canyon Live Oak Ravine Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

US Forest Service -Angeles National Forest; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga; Natural Landscape Block - San Dimas

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Interior live oak chaparral [*Quercus wislizenii* Woodland Alliance]; Association - *Quercus wislizenii*-*Ceanothus leucodermis*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

SUN2 is located along a high ridgeline in the San Gabriel Mountains. The vegetation is dominated by scrub oak and is recovering from a fire. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) is known to occur in San Antonio Canyon, about 1.5 miles to the west of Site SUN2. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-

related construction activities and travel on access roads could impact dispersing frogs, if present. Site SUN2 is not hydrologically connected to San Antonio Canyon. The site does not contain stream habitat for Greata's aster (*Symphytotrichum greatae*; 1B.3). Jeffery pine forest habitat for Hall's monardella (*Monardella macrantha* ssp. *hallii*; 1B.3) is not present in the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. The site does not contain Canyon Live Oak Ravine Forest.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory

(USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated San Dimas Natural Landscape Block which overlaps the ranges of approximately 272 amphibian, reptile, mammal and bird species. It is also located within an Essential Connectivity Habitat Area Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga that connects to the San Gabriel/Cucamonga and Lytle Creek Ridge Natural Landscape Blocks. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations SUN2 and SUN are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by P-19-186535; P-19-187829 encompasses the direct APE and three fourths of the indirect APE. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. There is also one additional recorded resource within this project location's indirect APE. Resource No. P-19-186918 (FS-

05015200101-HIS) is a segment of Forest Service Road 2N07, (the Sunset Ridge Fire Road/Sunset Peak Mountain Way), which was first recorded as a trail in 1924 and improved to a vehicle road by 1942. The road crosses the southeastern area of the indirect APE running northeast/southwest and is approximately 1,100 feet from the indirect APE at its closest point. The route of this road, as opposed to its physical surface, is considered historic and the road is a U.S. Forest Service Heritage Resource, but not an eligible or listed historical resource; therefore there would be no impacts from project activities on Resource No. P-19-186918 (FS-05015200101-HIS). LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower, a new equipment shelter and fuel tank mounted on a concrete pad, and extension of an existing chain link fence. There is existing communications equipment at this location and at other adjacent communications-related sites situated within between 800 and 1,800 feet of the direct APE. The sites include multiple lattice towers, equipment shelters, and associated infrastructure features. Construction of an additional tower at this project location would be in keeping with the existing communications/industrial landscape, including the presence of other towers within the immediate/adjacent environment. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the nature of this site and the identified resources at this project location, impacts from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

Project locations SUN2 and SUN are overlapping sites with slightly different, but immediately adjacent construction footprints. There are two historical resources within the direct and indirect areas of potential effects (APEs). The first of these is Resource No. P-19-186535, which is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. The second historical resource is Resource No. P-19-187829, which is eligible for inclusion in the National Register of Historic Places as the San Dimas Experimental Forest Historic District. This resource encompasses 17,161 acres of buildings, structures, sites, and landscapes that date to between 1933-1952. Included among the contributing landscape elements are the major topographical features found on the forest, because without this particular topography of streams and canyons forming isolated watersheds, Resource No. P-19-187829 would not have been selected as a location for an experimental forest. The Experimental Forest is the only such forest in Southern California, and believed to be the most significant within the U.S. Forest system. Both the direct and indirect APEs are completely encompassed by P-19-186535; P-19-187829 encompasses the direct APE and three fourths of the indirect APE. Given the enormous size and scale of Resource Nos. P-19-186535 and P-19-187829, the small footprint of the project site, and the lack of any uniquely definable associated resource features at this proposed project site, impacts would be less than significant. There is also one additional recorded resource within this project location's indirect APE. Resource No. P-19-186918 (FS-05015200101-HIS) is a segment of Forest Service Road 2N07, (the Sunset Ridge Fire Road/Sunset Peak Mountain Way), which was first recorded as a trail in 1924 and improved to a vehicle road by 1942. The road crosses the southeastern area of the indirect APE running northeast/southwest and is approximately 1,100 feet from the indirect APE at its closest point. The route of this road, as opposed to its physical surface, is considered historic and the road is a U.S. Forest Service Heritage Resource, but not an eligible or listed historical resource; therefore there would be no impacts from project activities on Resource No. P-19-186918 (FS-05015200101-HIS). LMR activities at this project location include attachment of whip and microwave antennas mounted on a proposed 180-foot lattice tower, a new equipment shelter and fuel tank mounted on a concrete pad, and

extension of an existing chain link fence. There is existing communications equipment at this location and at other adjacent communications-related sites situated within between 800 and 1,800 feet of the direct APE. The sites include multiple lattice towers, equipment shelters, and associated infrastructure features. Construction of an additional tower at this project location would be in keeping with the existing communications/industrial landscape, including the presence of other towers within the immediate/adjacent environment. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Given the nature of this site and the identified resources at this project location, impacts from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian igneous and metamorphic rock complex

Stability: Moderate pending geotechnical analysis

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1.25 miles southeast of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of material ranging from well-drained silty loam to gravelly loam with low to very high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site SUN2 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site SUN2 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site SUN2. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site SUN2 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site SUN2, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site SUN2 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Experimental Forest

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health, watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health

(USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as Experimental Forest. The Experimental Forest zone serves as a research and demonstration area, and is generally closed to the public except by permit. Access is controlled. The San Dimas Experimental Forest (SDEF) is a protected field laboratory for studies of hydrology, fire, and other topics relating to the ecology of chaparral and related ecosystems. It has been closed to the general public, except under special written permit. Uses within the SDEF include a communications site that was authorized by special-use authorization (USFS, Pacific Southwest Region 2005b).

Communications sites may be permitted within the SDEF, but would require special-use authorization. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. Compatibility of the proposed land use is further evaluated through the permit application process. No land use plan incompatibility impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Development of communication facilities at the site could result in the loss of forest land or conversion of forest land to non-forest use, but losses would be minimal as the site has been previously developed. Minimal impacts would be expected based on the presence of existing communications facilities, other developments, access roads, and ground disturbance.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Experimental Forest land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Sunset Ridge is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication sites would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 1.9

Disaster Route: State Route 210

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 4.41

Nearest Major Arterial: Mount Baldy Rd

Distance (Miles): 1.52

Access to the Project Site Provided Via: Extension off of Sunset Peak Mtwy

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Savage Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: TMT

Site Name: Table Mountain

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Hwy 2/Forest Service Rd 4N21

City: Wrightwood

State: CA

Zip: 92397

Latitude: 34.3829325874

Longitude: -117.685086871

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

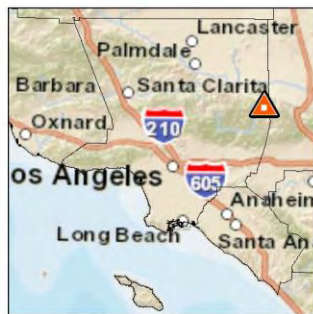
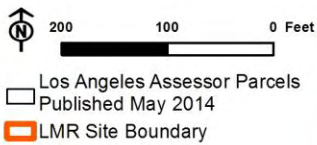
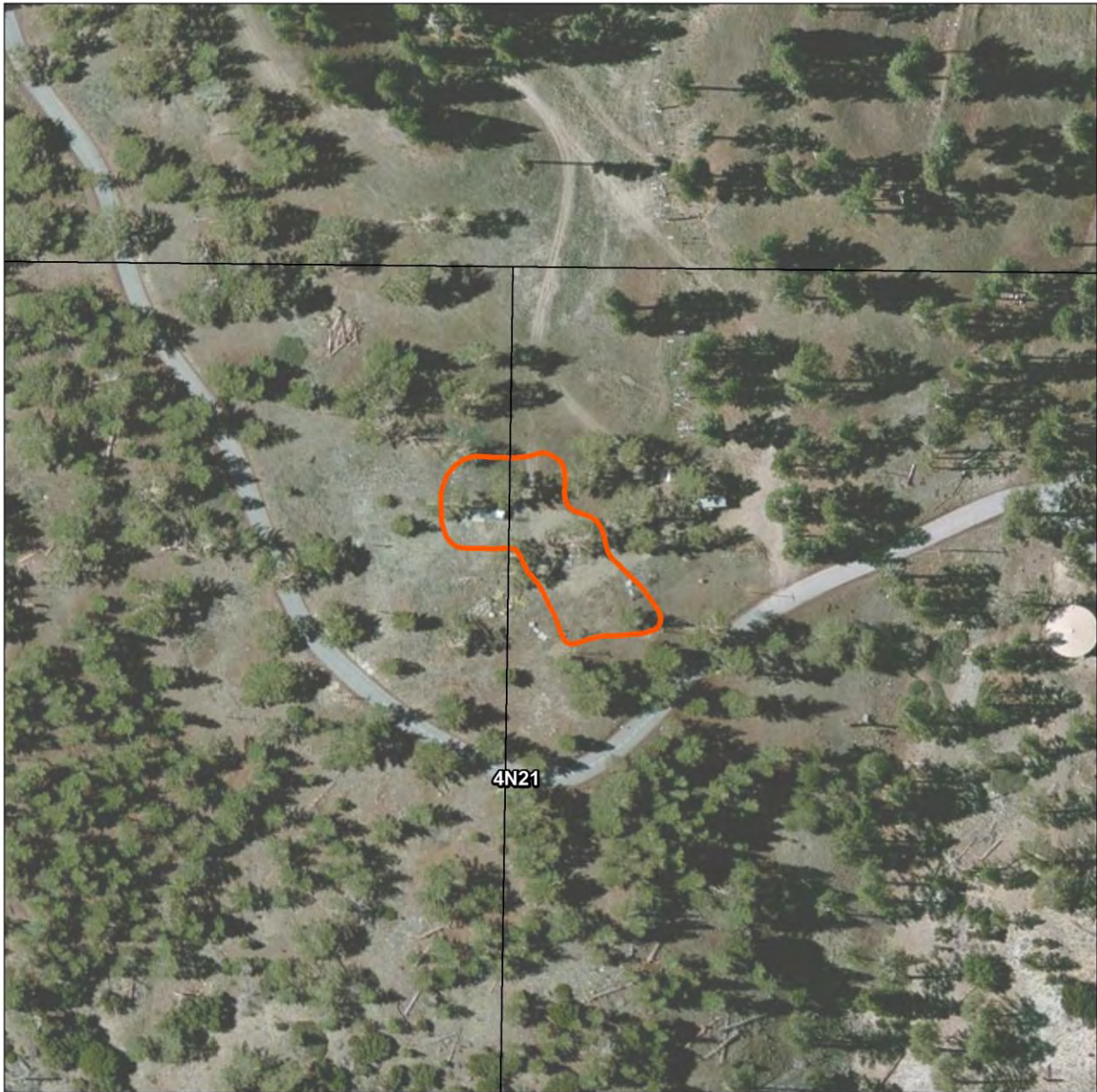
Existing Tower Type: Lattice

Existing Tower Height: unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 7513

TMT Site Boundary Map



TMT

Table Mountain
 Angeles National Forest - 4N22 Table Mountain Observatory
 Unincorporated, CA 92397

Proposed New Site Coordinates (NAD83):

Latitude: 34.382821
 Longitude: -117.684936
 Elevation (Feet): 7502

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is in Angeles National Forest located immediately adjacent to the Mountain High North Resort ski area on the north side of Angeles Crest Highway, a Scenic Byway. A small lattice tower of unknown height exists on the site, set adjacent to some trees. A dirt driveway forms a circle through sparse trees. Steep topography blocks views of the site from Table Mountain Road and Angeles Crest Highway, which provides access to both the site and the ski area. The site is approximately 100 feet west of, and on approximately the same elevation, as the top of the ski lift among thinly dispersed evergreen trees, and would be visible to winter recreationists at the top of the mountain. This site is also adjacent to the Table Mountain Campground and Camp McClellan. Another ski area, Mountain High Ski Resort, is located on a different hillside directly south of the site. Sensitive viewers include ANF visitors, particularly winter recreationists. The site is approximately 500 feet northwest of NASA's Table Mountain Observatory, a remote science and engineering facility in a "unique physical environment (high, dry and relatively pollution free)" that is used for "a substantial number of world-class science, technology and flight projects" addressing Sun–Earth system science, atmospheric composition, climate change, ozone depletion, planetary astronomy, optical communications, and flight project support (NASA 2014). The site is approximately 0.4 mile northeast of the Angeles Crest Scenic Byway. Highway 2, also known as the Angeles Crest Scenic Byway, is a 55-mile National Forest Scenic Byway that travels through the San Gabriel Mountains in Angeles National Forest. The goals of the National Forest Scenic Byways program include "showcase[ing] outstanding National Forest scenery" and "contribut[ing] to the nation's overall scenic byways effort" (USFS n.d.). According to the 2014 Los Angeles County General Plan Update EIR, the San Gabriel Mountains play a major role in physically defining the topographically and aesthetically diverse communities. These landforms create dramatic backdrops against developed communities, and provide extensive benefits to residents (County of Los Angeles 2014a). The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as A. SAC A is considered distinctive; 24% of Angeles National Forest is rated A (USFS 1995). The USFS zone for this area is Developed Area. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, and recreation and non-recreation special-uses facilities. This zone is the lowest designation for naturalness (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC A; Developed

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: State Route 2; Angeles Crest Scenic Byway

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would not be visible from the Angeles Crest Scenic Byway due to very steep topography, road cuts, and tall vegetation that obscure the site from view. The site would be visible to recreationists at the Mountain High North Resort ski area during winter, and would be visible to those at the Mountain High Resort ski area south of the site from the top of the ski lifts. However, the top of the ski area to the south is over one mile away. The new features would be uncharacteristic of the scenic vista without the presence of the ski resort immediately adjacent to the site. The chair lifts intrude onto the scenic vista and introduce vertical elements into the landscape, and ski runs cut swaths through the trees. The new facilities would not perceptibly change the scenic vista due to the presence of these elements and, to a lesser degree, the small existing tower, which would attenuate the noticeability of new structure. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would be added to it. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. The new tower would not interfere with views from telescopes used at the Table Mountain Observatory given its height and distance from the site. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Expansion of the site would be required to accommodate the new facilities. However, the site would be designed to avoid removal of or damage to vegetation, which consists of scattered trees within a disturbed area that do not constitute a scenic resource. No rock outcroppings, historic buildings, or other scenic resources exist in the area. The same construction activities described for scenic vistas, described above, would also apply.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Although the USFS scenic integrity objective for this area is high and the SAC rating (A) is distinctive, this area is also identified as a Developed Area zone. In such areas, the level of human use and infrastructure is typically higher than in other zones. This zone includes a number of highly popular developed recreation facilities, and recreation and non-recreation special-uses facilities. This zone is the lowest designation for naturalness. The site is already impacted by the presence of the ski resort. The new facilities would be compatible with the existing site, and with the surrounding landscape. The same construction activities described for scenic vistas, described above,

would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity. Any disturbed vegetation would be returned to existing conditions.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: Mojave Desert

Air Quality Management District: Antelope Valley

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM10 (unclassified)

State Nonattainment Status: O3, PM10, PM2.5 (unclassified)

Applicable Air Quality Management Plan(s):

AVAQMD 2004 Ozone Attainment Plan (State and Federal), AVAQMD Federal 8-Hour Ozone Attainment Plan, AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to H&S Code 39614(d), AVAQMD CEQA and Federal Conformity Guidelines

Significance Thresholds:

General Conformity (tons/year): CO (100), NOX, VOC (25); Local construction and operation (tons/year): CO (100), NOX, VOC (25), PM2.5, PM10 (15); Local construction and operation (lbs./day): CO (548), NOX, VOC (137), PM2.5, PM10 (82)

Nearest Sensitive Receptors: Research building

Distance to Sensitive Receptor: 721

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMD air quality plans considered in this analysis include the AVAQMD 2004 Ozone Attainment Plan (State and Federal) (AVAQMD 2004 Ozone Plan) (AVAQMD 2004). The purpose of this plan was to (1) demonstrate that the AVAQMD would meet the primary O3 NAAQS by the end of 2007; (2) present progress by the AVAQMD toward meeting all state planning milestones including attainment of the O3 CAAQS; and (3) discuss the 8-hour O3 NAAQS in preparation for a new nonattainment designation under a revised standard. Also considered in this analysis of Project air quality impacts is the AVAQMD Federal 8-Hour Ozone Attainment Plan (Western Mojave Desert Nonattainment Area) (AVAQMD 8-Hour Ozone Plan) (AVAQMD 2008). The purpose of this plan is to (1) demonstrate that the AVAQMD will attain the primary O3 NAAQS by June 2021; (2) present progress by the AVAQMD toward meeting all required O3 planning milestones and NAAQS and CAAQS; and (3) discuss the newest 0.075 ppm O3 NAAQS in anticipation of a nonattainment designation for this revised standard.

Finally, the analysis considered the AVAQMD Implementation Schedule for Measures to Reduce PM pursuant to Health and Safety Code 39614(d) (AVAQMD PM Measures Plan) (AVAQMD 2005). The purpose of this plan is for the AVAQMD to develop a list of Best Available Control Technologies (BACT) either currently being implemented or for future consideration to control particulate emissions within the district.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site TMT. The analysis indicates that emissions from the construction of all the proposed Project sites located in the MDAB including site TMT would not exceed AVAQMD significance thresholds for the listed criteria pollutants including O3 precursor NOx. Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of all the proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for any criteria pollutants including O3 precursor NOx and particulate matter. Therefore, the Project would not conflict with or obstruct implementation of the

AVAQMD 2004 Ozone Plan, AVAQMD 8-Hour Ozone Plan, or the AVAQMD PM Measures Plan. Impacts of the proposed Project on the implementation of the AVAQMD plans would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Emissions from the construction from proposed LMR Site TMT or emissions from the simultaneous construction of the three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for criteria pollutants. Per AVAQMD guidance, compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not violate any air quality standards or contribute substantially to an existing or projected air quality violation; therefore, Project construction impacts in the MDAB would be less than significant.

Operational emissions of the proposed LMR Site TMT or the operational emissions of all Project sites in the MDAB are less than significant and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; therefore, Project operational impacts would be less than significant in the MDAB.

Mitigation Measure(s):

No mitigation measures are required.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3 and PM10 (CAAQS) in the MDAB. Cumulatively considerable net increases in these pollutants were examined relative to the AVAQMD significance thresholds for each.

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3 and PM10 (CAAQS) in the MDAB. Cumulatively considerable net increases in these pollutants were examined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed LMR Site FRP or the simultaneous construction of all three proposed Project sites located in the MDAB would not exceed AVAQMD significance thresholds for O3 and PM10. Per AVAQMD guidance, compliance with these significance thresholds is sufficient to demonstrate that construction of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project construction emissions in the MDAB would be less than significant.

Operational emissions of the proposed LMR Site FRP or all Project sites in the MDAB would not exceed AVAQMD significance thresholds for O3, and PM10. Per AVAQMD guidance (AVAQMD, 2011), compliance with these significance thresholds is sufficient to demonstrate that operation of the proposed Project sites in the MDAB would not result in cumulatively considerable net increases in these pollutants; therefore, Project operational emissions in the MDAB would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The AVAQMD considers residences, schools, daycare centers, playgrounds and medical facilities to be sensitive receptor land uses. Exposure of sensitive receptors to substantial pollutant concentrations as defined above in Chapter 3.2.3.1, Criterion 4 is required for the following project types: (1) any industrial project within 1,000 feet; (2) a distribution center (40 or more trucks per day) within 1,000 feet; (3) a major transportation project (50,000 or more vehicles per day) within 1,000 feet; (4) a dry cleaner using perchlorethylene within 500 feet; and (5) a gasoline dispensing facility within 300 feet.

While the Project as proposed does not fall within one of these project types; the analysis of sites within the MDAB includes a qualitative assessment of pollutants that impact human health.

The use of off-road heavy-duty diesel equipment by the Project for demolition, site grading and excavation, and concrete pad construction activities would result in the generation of diesel particulates (DPM) emissions. DPM were identified as a toxic air contaminant (TAC) by CARB in 1998. Other potential TAC sources associated with construction include the demolition of asbestos-containing materials and the excavation of naturally occurring asbestos (NOA) in soils. The monthly one hour test of the backup generator at each proposed Project site, including site TMT would generate DPM emissions. Emergency operation of the backup generators, which is anticipated to have a 200 hour continuous operational capacity would also generate DPM emissions. No other operational sources of these or other TACs would occur.

According to the Consolidated Table of Office of Environmental Health Hazard Assessment (OEHHA)/ CARB Approved Risk Assessment Health Values, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SCAQMD, 2015; SMAQMD, 2014); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA, 2015).

As discussed in Appendix B, the maximum construction activity scenario assumed at site TMT and all proposed sites would have a six week duration. Similarly, the duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project construction and operation is not warranted.

Demolition of existing structures at proposed sites in the MDAB would be subject to AVAQMD Rule 1403. Rule 1403 is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. The rule addresses the national emissions standards for asbestos along with some additional requirements. The rule requires lead agencies and their contractors to notify the District of any regulated renovation or demolition activity. By complying with District Rule 1403, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the MDAB, including site TMT, would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per AVAQMD guidance (AVAQMD 2011), compliance with the criteria pollutant significance thresholds and the health risk based significance threshold established by AVAQMD Criterion 4 is sufficient to demonstrate that

construction and operation of the proposed Project sites in the MDAB, including site TMT, would not result in sensitive receptor exposure to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site TMT and all proposed Project sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to AVAQMD Rule 402. In addition, the operation of all Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to AVAQMD Rule 402; therefore, Project impacts would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*; CDFW-SSC); southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); San Gabriel Mountains blue butterfly (*Plebejus saepiolus aureolus*; USFS-S); south coast marsh vole (*Microtus californicus stephensi*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

Big Bear Valley woollypod (*Astragalus leucolobus*; 1B.2); grey-leaved violet (*Viola pinetorum* var. *grisea*; 1B.3); San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*; 1B.3)

Sensitive Communities Recorded within 1 Mile:

Canyon Live Oak Ravine Forest

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E); Big Bear Valley woollypod (*Astragalus leucolobus*; 1B.2); San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius* 1B.3); grey-leaved violet (*Viola pinetorum* var. *grisea*; 1B.3)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SEA - Antelope Valley; SCAG Zoning - Wildlife Preserves and Sanctuaries; Essential Connectivity Area - Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Jeffrey Pine Forest [*Pinus jeffreyi* Forest Alliance]; Association -*Pinus jeffreyi*-*Symphoricarpos longiflorus*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site TMT is located near the top of Table Mountain in the San Gabriel Mountains, at an elevation of approximately 7,500 feet. The vegetation is Jeffery pine forest. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. The pallid San Diego pocket mouse

(*Chaetodipus fallax pallidus*; CDFW-SSC) occurs in scrub type habitat at elevations up to about 6,000; the project area is outside the elevation range and does not include appropriate habitat for the species. The south coast marsh vole (*Microtus californicus stephensi*; CDFW-SSC) is found in association with tidal marshes; no suitable habitat is present within the project area for the species. Soils Southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) designated critical habitat and frog occurrence records are known from the San Gabriel River critical habitat unit approximately 2 miles to the southwest of Site TMT. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. The San Gabriel Mountains blue butterfly (*Plebejus saepiolus aureolus*; USFS-S) is presumed extinct. It was known only from a single wet meadow within the yellow pine forest near the Big Pines Ranger Station, San Gabriel Mountains, Angeles National Forest, California. Its host plant was *Trifolium wormskioldii*. No wet meadow habitat is found in the project area. The site contains potential habitat for Big Bear Valley woollypod (*Astragalus leucolobus*; 1B.2) and San Antonio milk-vetch (*Astragalus lentiginosus* var. *antoni* 1B.3); during the habitat assessment survey conducted 8/26/2014 an unidentified species of *Astragalus* was observed; a summer survey is required for species level identification. Though the shallow rocky soils at the project site provides poor habitat for the grey-leaved violet (*Viola pinetorum* var. *grisea*; 1B.3), potentially suitable habitat may be present in mesic micro-sites within the project area. Surveys conducted 8/28/2015 did not locate the plant. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of special status plants, and southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) in the project area and along access roads. To protect dispersing southern mountain yellow-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct summer botanical surveys for Big Bear Valley woollypod (*Astragalus leucolobus*; 1B.2), San Antonio milk-vetch (*Astragalus lentiginosus* var. *antoni* 1B.3), and grey-leaved violet (*Viola pinetorum* var. *grisea*; 1B.3); if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site; Canyon Live Oak Ravine Forest was not observed in the project area. Site TMT is hydrologically connected to stream habitats that include southern mountain yellow-legged frog (*Rana muscosa*; ESA-E, CA-E) critical habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The site is located within a CDFW Essential Connectivity Habitat Area Sugarloaf Mountain/Keller Peak - San Gabriel/Cucamonga that connects to the San Gabriel/Cucamonga, Pleasant View Ridge, and Table Mountain Natural Landscape Blocks. This site is also located within the Antelope Valley Significant Ecological Area and north of Saddleback Butte State Park, which is identified as an important regional habitat linkage in the Los Angeles General Plan. This SEA serves as a major movement corridor for wildlife species as well as plants, and serves as a linkage between the San Gabriel Mountains and the Mojave Desert and into Kern and San Bernardino Counties. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

Recommended mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct area of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. Within the indirect APE, there are 27 additional recorded resources. These include Resource No. P-19-186810 (FS-05015400143), the Robin and Blue Ridge circuits of a Southern California Edison (SCE) transmission line (wooden poles and cross arms with ceramic insulators) constructed between 1928 and 1963. This resource runs adjacent to the boundary of the direct APE, but most of the circuit has been replaced over time and retains insufficient integrity to be considered a historical resource under the CEQA guidelines. Of the remaining 26 recorded resources within the indirect APE, only one (Resource No. P-19-1604H; FS-05015400011-HIS) is a historical resource. This resource encompasses buildings, structures, landscape features, and refuse deposits dating from 1923-1940. Resource No. P-19-1604H has been determined eligible for inclusion in the National Register of Historic Places (National Register) as the Big Pines Park Headquarters Complex; it is situated approximately 0.36 miles from the direct APE and beyond line-of-sight due to mountainous terrain and forest. Also within the indirect APE is Resource No. P-150007 (FS-05015400073-HIS), the

McClellan Flat Recreational Residence (a Forest Service Heritage Resource), which is a cluster of structures built between 1910 and 1950, 13 of which are still in use. Although a Heritage Resource, this resource has been previously evaluated for inclusion in the National Register and has not been determined eligible as a historical resource. The remaining recorded resources within the indirect APE have been determined to be not historical resources and all are situated between 0.1 and 0.5 miles from the direct APE. LMR activities at this project location include attachment of whip and microwave antennas on a proposed 180-foot lattice tower, construction of a new equipment shelter, and installation of a backup generator and fuel tank on a concrete pad. The project site (direct APE) is heavily disturbed from the previous construction of an existing communications site, equipment shelter, and lattice tower; a road; the former lookout station; and an adjacent ski lift. The condition and status of cultural resources at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in November 2014. Based on the nature of the project site and the identified historical resources and their locations, impacts from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features associated resource features at this proposed project site, impacts would be less than significant. However, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Precambrian igneous and metamorphic rock complex

Stability: Moderate pending geotechnical analysis

Soil Type: Tollhouse-Rock outcrop-Etsel family-Bakeoven Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line (San Andreas) has been identified approximately 1/4 mile southwest of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These

acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained gravelly to cobbly loam with moderate runoff and moderately rapid permeability. Moderate slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: Mojave Desert

Air Quality Management District: Antelope Valley

AQMD Significance Threshold: 100,000 tons CO₂eq/year (548,000 lbs. daily), 25,000 metric tons (MT) CO₂equivalent(eq)/year amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

Executive Orders S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, Senate Bill 97, AVAQMD CEQA and Federal Conformity Guidelines, Rule 3011 GHG Provisions of Federal Operating Permits

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site TMT and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the three (3) proposed Project sites in the MDAB. The generator test would last one hour at each site during a single day each month. It was also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site TMT was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all three (3) Project sites in the MDAB are estimated at 142.24 TCO₂e (129 MTCO₂e), or less than 47 TCO₂e (43 MTCO₂e) annually for proposed Project site TMT. To be consistent with the analysis of sites located in the SCAB/SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site TMT would be substantially below the AVAQMD annual 100,000 TCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to

2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site TMT, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the AVAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site TMT would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Lahontan

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. East Table Mountain is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Angeles Crest Hwy

Distance (Miles): 2.03

Disaster Route: State Route 2

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Foothill Frwy

Distance (Miles): 0.37

Nearest Major Arterial: Antelope Hwy

Distance (Miles): 5

Access to the Project Site Provided Via: Forest Service Road 4N21

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Antelope Valley Recycling and Disposal Facility

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: TOP

Site Name: Topanga Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Topanga Tower Mountain Way

City: Topanga

State: CA

Zip: 90290

Latitude: 34.0836152843

Longitude: -118.8156122

Jurisdiction:

Landowner: Los Angeles County, Waterworks District 29

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

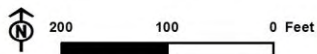
Existing Tower Type: Monopole (2)

Existing Tower Height: 26' each

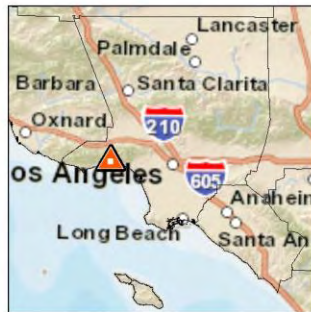
Existing Site Use: Water Tank

Existing Ground Elevation (feet AMSL): 2587

TOP Site Boundary Map



- Los Angeles Assessor Parcels Published May 2014
- LMR Site Boundary



TOP

Topanga Peak
 Topanga Tower Mountain Way
 Unincorporated, CA 90290

Proposed New Site Coordinates (NAD83):

Latitude: 34.08363
 Longitude: -118.639301
 Elevation (Feet): 2587

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is within Santa Monica Mountains National Recreation Area off Saddle Peak Road just east of the intersection with Stunt Road on a ridgeline designated by Los Angeles County as “significant.” The site includes a microwave dish and whip antennas mounted to monopoles, as well as a water tank, small one-story building, and chain link fence enclosing the site, which is paved. A large radio relay tower is immediately adjacent to the site to the east. The radio tower is tall and broad, and is a prominent feature on the ridgeline. Both the monopoles and radio tower are clearly visible from segments of east- and west-bound traffic on Saddle Peak Road. The Backbone Trail passes between the site and Saddle Peak Road, and a trailhead and pullout exist on the road just east of the site. The site is surrounded by low chaparral vegetation and exposed buff-colored rocks. Sensitive viewers include NRA visitors and hikers on the Backbone Trail. The view is dominated by the ridgeline, roadway corridor, and radio tower. This site is located in proximity to the Backbone Trail. The Backbone Trail is a Santa Monica Mountains ridgeline trail that follows ridges, traverses chaparral-covered hillsides, enters oak woodlands, and crosses creeks and valleys in the Santa Monica Mountains National Recreation Area. Trail development has occurred piecemeal across a patchwork of public lands, and therefore has different names in some sections, and not all sections are open to all users.

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Monica Mountains Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Backbone Trail; Saddle Peak Road

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: adjacent to Topanga State Park

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: Yes

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a designated significant ridgeline and is within view of some sections of the Backbone Trail, as well as a trailhead. The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes a large, bulky radio tower and two shorter, slim monopoles that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be

related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of the existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. There would be no substantial change to the visual character or quality of the significant ridgeline, SMMNRA, or Backbone Trail. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare

that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 1336

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site TOP. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that Nox emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site TOP or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site TOP would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site TOP will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site TOP would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site TOP or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site TOP, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site TOP, which is 1,336 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site TOP and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site TOP in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site TOP and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); western pond turtle (*Emys marmorata*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon - foraging (*Falco peregrinus anatum*; CDFW-FP); California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet);

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Santa Monica Mountains National Recreation Area (NPS); Los Angeles County - Los Angeles Holding 9; SEA/CRA - Santa Monica Mountains (Cold Creek); Natural Landscape Block - Calabasas Peak/Santa Monica Mountains

Local Policy or Ordinance for Biological Resources:

Santa Monica Mountains Local Coastal Program Land Use Plan and Local Implementation Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Eriogonum fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site TOP is located on a hill top along a ridgeline in the Santa Monica Mountains. The site contains dense chamise chaparral. Woody species dominating the vegetation are bush buckwheat (*Eriogonum fasciculatum*), deer vetch (*Acmispon glaber*), bush monkeyflower (*Diplacus aurantiacus*), laurel sumac (*Malosma laurina*), scrub oak (*Quercus* sp.) and toyon (*Heteromeles arbutifolia*). The American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may

pass by the site while foraging, but the project area does not provide steep cliff habitat required for nesting (suitable nesting habitat may be present within one mile). California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC) and coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) could occur in the project area and could be killed project activities. Potentially suitable habitat (and a potential reintroduction site) for California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) has been reported by Santa Monica National Recreation Area to occur within 1 mile of Site TOP at an unspecified location within Cold Creek Nature Preserve. Though the project site is located in steep mountain terrain and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. Project-related construction activities and travel on access roads could impact dispersing frogs, if present. The monarch butterfly (*Danaus plexippus*; ESA-Pet) may pass through the project area and roost in nearby trees. No aquatic/riparian habitat suitable for two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC) or western pond turtle (*Emys marmorata*; CDFW-SSC) occur within the project area. The study area contains potential habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, ESA-CH, 1B.1) but it is not likely to be observed until the area burns. The project footprint is within previously cleared and mostly paved lands. Braunton's milkvetch may be present in the study area, but project activities confined to previous disturbance area. Preconstruction surveys would not be necessary. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC), California mountain kingsnake (San Diego population; *Lampropeltis zonata pulchra*; CDSFW-SSC), and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. To protect dispersing California red-legged frogs, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measureable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Conduct a preconstruction survey of nearby trees for roosting monarch butterflies. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community occur within 500 feet of the project site. Site CPK may be hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) potentially suitable habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to an ephemeral drainage. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Calabasas Peak/Santa Monica Mountains Natural Landscape Block which overlaps the ranges of approximately 276 amphibian, reptile, mammal and bird species. The site is also located within the proposed Santa Monica Mountains Coastal Resource Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. Linkages in this CRA connect open spaces together that may be fragmented due to rural development and connect to habitats in Ventura County. Cold Creek is a permanent stream managed by the Mountains Restoration Trust. It is a privately owned 1000 plus acre site open to the public by reservation only and managed primarily for hiking and restoration of weedy areas. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site TOP is comprised solely of H3 habitat. The study area for Site TOP contains H2 habitat and H1 Quiet Zone. Protection of SERAs identified in the land use plan (LUP) includes prohibition or other strict regulation of proposed site development. Policies contained within Goal CO-2 of the LUP offer protection of SERAs as a priority over other development standards in the Local Implementation Plan. Impacts to resources at the site are described in Impact BIO 1, Impact BIO 2, and Impact BIO 3. Existing site conditions include disturbed areas that are not considered SERAs, and therefore not subject to SERA restrictions. Because construction activity would potentially affect SERA(s), and construction and operations activities could impact migratory birds and other special-status species, a potential for conflict exists with LUP policies CO-40, CO-41, CO-42, and CO-44. This conflict would constitute a

significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Required mitigation measures:

• BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 22 Monarch Butterfly Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: Yes

Native American: Yes

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no previously recorded historical resources within the direct area of potential effects (APE). However, adjacent to the direct APE there are two previously unrecorded resources – one archaeological site and one Cold War-era architectural resource. Both resources were identified during a site visit in January 2015. Given the location of the archaeological materials, it is highly probable that the site was impacted during previous construction and continues well beyond the 50-foot buffer in all directions – including beneath the adjacent existing, fenced communications site. The newly identified architectural resource is approximately 150 feet east of the direct APE. This resource consists of a fenced area consisting of one of a system of 107 microwave radio-relay towers and equipment shelters designed to transmit telephone and television signals nationwide. The system was activated in 1951 and abandoned in the mid-1990s when fiber optic lines replaced the distinctive horn-antenna microwave system. By 1999, most of the system sites had been demolished or sold to communications-related companies or private parties. The nuclear attack-resistant concrete tower and hardened bunker-like equipment shelter at the TOP location was completed in 1979. All of the original equipment has been removed from the tower and shelter and both are covered in modern graffiti; as a result, this architectural retains insufficient integrity to be eligible for inclusion in the National Register of Historic Places or California Register of Historical Resources. The TOP project area itself encompasses an existing water tank, equipment shelter, and several communications antennas mounted on differing types of low monopoles. The site is situated on a paved surface and enclosed by a gated and locked chain-link fence. The remainder of the indirect APE encompasses primarily

undeveloped mountainous terrain and two very small housing areas, each situated approximately 0.25 miles from the direct APE. Residences situated at the southwest boundary of the indirect APE were constructed in the late 1970s. Residences situated at the southeast boundary of the indirect APE were constructed in the 1990s. LMR activities at this project location include attachment of whip and microwave antennas on a proposed 180-foot lattice tower, construction of a new equipment shelter, and installation of a backup generator and fuel tank on a concrete pad. The condition and status of this project area were confirmed through archival research and during a field survey by an SOI-qualified archaeologist and architectural historian in January 2015. Based on the nature of this project site and the identified resources, there would be no direct or indirect impacts on the identified Cold War-era feature due to its lack of integrity or the two modern housing areas. Impacts would be significant on archaeological resources at this project site; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors would ensure that archaeological resources are protected. As well, to avoid additional impacts to the newly identified archaeological site, access to the area of the archaeological site would be restricted to all construction and operational personnel.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

As described in CUL-1, an archaeological site was newly identified during a site visit in January 2015. Given the location of the archaeological materials, it is highly probable that the site was impacted during previous construction and continues well beyond the 50-foot buffer in all directions – including beneath the adjacent existing, fenced communications site. Impacts would be significant on archaeological resources at this project site; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors are required during all ground disturbing activities at this project location to ensure that archaeological resources are protected. As well, to avoid additional impacts to the newly identified archaeological site, access to the area of the archaeological site would be restricted to all construction and operational personnel.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as the Oligocene to Miocene Sespe Formation, which has a high potential for significant vertebrate fossils. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this formation in the Santa Monica Mountains region, including specimens of frog, opossum, pika, mouse, and the even-toed ungulate *Blastomeryx*. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Sespe Formation to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History

Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs); however, based on the archaeological materials found adjacent to the direct APE that may also extend beneath the project area, this project area may be sensitive for them. Impacts would be significant at this project site; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors would ensure that archaeological resources are protected. As well, to avoid additional impacts to the newly identified archaeological site, access to the area of the archaeological site would be restricted to all construction and operational personnel.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Tribal cultural resources as defined by California Assembly Bill 52 may be situated within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs; however, field surveys in January 2015 indicate that the direct and indirect APEs may be sensitive for them. Impacts would be significant at this project site; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors would ensure that archaeological resources are protected. As well, to avoid additional impacts to the newly identified archaeological site, access to the area of the archaeological site would be restricted to all construction and operational personnel.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require

additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained light clay loam with low to very high runoff and moderate permeability. Moderate slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical

analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site TOP and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site TOP was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site TOP. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site TOP would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site TOP, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site TOP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Monica Mountains Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Public and Semi-Public Facilities

Zoning: Light Agriculture

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Monica Mountains Coastal Zone

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site TOP is proposed along an adopted Significant Ridgeline within the Santa Monica Mountains Coastal Zone. The Santa Monica Mountains Land Use Plan, a component of the Santa Monica Mountains Local Coastal Program, was issued in August 2014 and allows for telecommunication facilities within several land use categories, including open space, rural lands, rural residential, rural villages, residential, commercial, commercial recreation – limited intensity, and public and semi-public facilities (County of Los Angeles, Department of Regional Planning 2014). Per the Local Implementation Plan adopted in 2014, new development is prohibited on Significant Ridgelines. Structures must be located sufficiently below Significant Ridgelines so that the highest point of a structure is located at least 50 vertical feet and 50 horizontal feet from a Significant Ridgeline. The proposal is to establish a 180-foot-tall tower at an existing communications. This would result in a conflict with the Santa Monica

Mountains Land Use Plan.

In addition, Site TOP is within 400 feet of Saddle Peak Road, a designated Scenic Route. Land Use Plan Policy CO-147 limits maximum allowable height to 18 feet above existing or finished grade, whichever is lower, along Scenic Routes. Land Use Plan Policy CO-152 indicates wireless telecommunication facilities along Scenic Routes should be co-located where feasible and made to blend into the landscape.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Monica Mountains Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: S Topanga Canyon Blvd

Distance (Miles): 1.25

Disaster Route: Pacific Coast Highway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: State Route 27

Distance (Miles): 2.03

Nearest Major Arterial: Mulholland Hwy

Distance (Miles): 1.69

Access to the Project Site Provided Via: Radio Relay

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST #29

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: TPK

Site Name: Tejon Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 37407 Gorman Post Rd

City: Gorman

State: CA

Zip: 93243

Latitude: 34.8031087461

Longitude: -118.815662727

Jurisdiction:

Landowner: Ralphs, Ronald A Co TR ET AL

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

Existing Tower Type: Lattice (1), monopole (1) adjacent; more lattice towers are in vicinity

Existing Tower Height: Lattice 60'; Monopole 15'

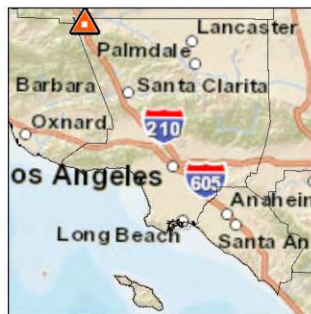
Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 4882

TPK Site Boundary Map



- Los Angeles Assessor Parcels Published May 2014
- LMR Site Boundary



TPK

Tejon Peak
37407 Gorman Post Rd.
Unincorporated, CA 93243

Proposed New Site Coordinates (NAD83):

Latitude: 34.803101
Longitude: -118.815612
Elevation (Feet): 4868

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site consists of a small, one-story equipment shelter, 60-foot lattice tower with attached antennas, and 15-foot monopole on dirt ground on a hilltop enclosed by a chain link fence. Five large microwave dishes are attached to the lattice tower, and one is attached to the monopole. Seven similar sites are within a 370-foot radius of this site. Other than that, the remaining area is undeveloped and consists primarily of barren ground with low, weedy grasses. Pockets of vegetation exist at the northeastern perimeter of the area.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes a lattice tower and monopole that already create a visual intrusion onto the landscape. In addition, seven similar sites, all of which include towers of varying types and heights, are immediately adjacent to this site. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of several existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and its immediate surroundings. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Equestrian center

Distance to Sensitive Receptor: 15444

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site TPK. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site TPK or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site TPK would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site TPK will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site TPK would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site TPK or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site TPK, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site TPK, which is 15,444 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 15 are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site TPK and were not assessed further.

As discussed in Appendix B, the maximum construction activity scenario assumed at each site would have a six week duration. Similarly, the duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project construction and operation is not warranted.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site TPK in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer

station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site TPK and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*; DFW-SSC); yellow-blotched salamander (*Ensatina eschscholtzii croceator*; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Valley Needlegrass Grassland; Wildflower Field; California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); golden eagle (*Aquila chrysaetos*; CDFW-FP); coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*; DFW-SSC)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

SEA - San Andreas (Tehachapi Foothills); Natural Landscape Block - Oso Canyon

Local Policy or Ordinance for Biological Resources:

Los Angeles County General Plan - San Andreas Significant Ecological Area

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Brome grass grasslands [*Bromus rubens*-*Schismus (arabicus, barbatus)* Semi-Natural Herbaceous Stands];

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site TPK is located on a broad mountain top on Tejon Peak. Woody vegetation is dominated by canyon live oak in the canyons but mostly non-native grassland dominated by cheatgrass (*Bromus tectorum*) and red brome (*B. rubens*) with canyon live oak in the draws and canyons outside of the study area. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and designated critical habitat is located just less than one mile north. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these

structures. The proposed developments include the addition of a new lattice tower that could be used as perches by condors. Coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC) may occur on-site and individuals could be killed by project activities. Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*; CDFW-SSC) has been recorded within the project vicinity, with a few additional occurrences (historic and recent) in the Tehachapi Mountains. This is a very rare rodent known only from a few locations in a limited range. Its habitat includes native and non-native grasslands, and it constructs burrows in loose, sandy soils. The primary threat to the species is thought to be habitat fragmentation, though any type of surface disturbance may cause adverse impacts if the species is present. The elevation of the project site (4,885 feet) is within the elevation range for the species (3,500 to 6,000 feet). There are scattered small mammal burrows in the area; no species-specific surveys have been conducted; suitable habitat may be present in the study area. No aquatic or riparian habitat suitable for the yellow-blotched salamander (*Ensatina eschscholtzii croceator*; CDFW-SSC) occurs within the project area. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California condors, Tehachapi pocket mouse, and coast horned lizard in the project area, and the importance of maintaining a clean construction site. A biological monitor will be present during construction; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 WEAP
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 6 Anti-perch Devices
- BIO MM 7 California Condor Protection
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 17 Raptor Protection
- BIO MM 18 Nesting Bird Protection
- BIO MM 19 Trenches and Holes Management
- BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Wildflower field, a sensitive natural community, is within 500 feet of the project site. No Valley Needlegrass Grassland was identified (no needlegrass was observed during the survey). Though the project area has been highly degraded and non-native grasses dominate, native species persist and elements of the wildflower fields are expected to emerge in spring.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Do not remove riparian trees. Stay on existing roads. Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental

Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 11 Site Access • BIO MM 19 Trenches and Holes Management • BIO MM 23 Prevent the Spread of Nonnative Vegetation

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Oso Canyon Natural Landscape Block which overlaps the ranges of approximately 266 amphibian, reptile, mammal and bird species. It is also located within the San Andreas (Portal Ridge-Liebre Mountain) Significant Ecological Area, which is identified as an important regional habitat linkage in the Los Angeles General Plan. This SEA is an important linkage between the Coastal Ranges, the San Gabriel Mountains, and the Tehachapi Mountains which also represent the only mountain linkage from the Transverse Ranges and the Coast ranges to the Sierra Nevada Range. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. Additionally, due to the nature of the project, impacts to wildlife movement would be minimal to none. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Construction at Site TPK could result in removal of vegetation and human disturbance at each site and therefore could result in conflict with the Los Angeles County General Plan's Policy C/NR 3.1, which calls for conservation and enhancement of ecological function diverse natural habitats and biological resources. The site contains an existing tower facility, related infrastructure, and access road along with disturbed native scrub vegetation. The current use at the site is communications facility, and substantive removal of native vegetation is not expected.

Construction and operations activities at the site do have the potential to impact biological resources, as described in Impact BIO 1 and Impact BIO 2. These impacts to resources conflict with Policy C/NR 3.1. Site TPK is an already disturbed site adjacent to at least nine other communication towers and is approximately 1 mile northeast of Interstate-5. It is also located at the far northwestern section of the almost 100,000-acre San Andreas Significant

Ecological Area (SEA). Its location at the convergence of the Coastal Ranges into the San Gabriel Mountains, Antelope Valley, and Tehachapi Mountains provides for an important wildlife corridor; however, due to its already developed nature, construction activities will not significantly impact migration corridors or wildlife linkages between metapopulations of species. Additionally, the site is dominated by nonnative grassland habitat which is not the pristine headwaters, riparian habitat, marshes and sinks, or diverse vegetation communities unique to this SEA. Because Site TPK is already a developed communication site, conflicts associated with Policy C/NR 3.8 are considered minor, and impacts associated with construction at the site would be less than significant. Proposed construction of Site TPK would have the potential to impact biological resources within the SEA, and design could potentially fail to prioritize avoidance of the most sensitive biological resources on site. As a result a conflict with Policy C/NR 3.9 would occur, resulting in a significant impact to biological resources identified in Impact BIO 1 and Impact BIO 2. Because a potential for significant impact associated with the resources protected by the Los Angeles County General Plan exists, this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 and Impact BIO 2 would reduce impacts from construction and operations to less than significant. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 13 Coastal California Gnatcatcher Breeding Season Protocol Surveys • BIO MM 14 Coastal California Gnatcatcher Breeding Season Restriction • BIO MM 15 Southwestern Willow Flycatcher Protection • BIO MM 16 Snowy Plover Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Monarch Butterfly Protection • BIO MM 24 Prevent the Spread of Nonnative Vegetation • BIO MM 25 Special Status Plants Surveys and Protection

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Walong-Rock outcrop-Edmundston-Anaverde Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1.25 miles southwest of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the

Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained sandy loam with medium to very rapid runoff and moderately rapid permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: Less than Significant Impact

Discussion:

The potential for localized land spreading, subsidence, and/or collapse is Less than Significant due to the soil characteristics at the site. Factors that cause these hazards, including dissolution of limestone and mining are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse are not expected since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site TPK and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site TPK was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site TPK. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site TPK would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site TPK, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site TPK would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Lahontan

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Rural

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Antelope Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Golden State Frwy

Distance (Miles): 21.89

Disaster Route: Interstate 5

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 1.25

Nearest Major Arterial: Ridge Route Rd

Distance (Miles): 3.83

Access to the Project Site Provided Via: Tejon Mountain Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: TWR

Site Name: Tower Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Banning House Rd

City: Santa Catalina Island

State: CA

Zip: 90704

Latitude: 33.4295282086

Longitude: -118.478298254

Jurisdiction:

Landowner: Santa Catalina Island

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

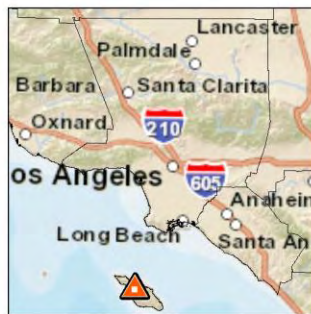
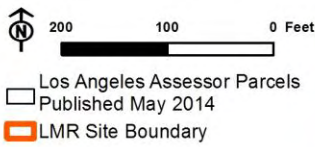
Existing Tower Type: Lattice

Existing Tower Height: 100'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 1234

TWR Site Boundary Map



TWR

Tower Peak
 Banning House Rd.
 Avalon, CA 90704

Proposed New Site Coordinates (NAD83):

Latitude: 33.42956
 Longitude: -118.478222
 Elevation (Feet): 1220

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is within the coastal zone within Catalina Island's interior on the north side, just south of Two Harbors. California's Coastal Act states that "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas . . . shall be subordinate to the character of its setting." The site is located approximately 0.5 mile west of Little Harbor Road, the island's primary road, on top of a ridgeline. Vegetation is primarily low; none reaches above the site or obscures it. A 100-foot tall lattice tower exists on the site, which also includes a rectangular one-story shelter surrounded by a chain link fence. The surface is dirt and grass. The site would be in view of the Trans Catalina hiking trail to the south (Catalina Chamber n.d.). Sensitive viewers would be hikers and visitors traveling the primary road.

Visual Sensitivity: High

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, Santa Catalina Island Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Trans-Catalina Trail

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located on a ridgeline within view of some sections of the Trans Catalina Trail. The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes an existing lattice tower that already creates a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with an existing structure would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. This would help protect views to and along the ocean and scenic coastal areas as called for within the coastal zone. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual

impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of the existing tower. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site. Construction activities would result in minor and short term impacts to visual resources.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Cabins

Distance to Sensitive Receptor: 5316

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site TWR. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site TWR or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site TWR would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site TWR will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and

verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site TWR would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, Nox emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site TWR or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site TWR, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site TWR, which is 5,316 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds for NO_x, CO, PM_{2.5}, lower for PM₁₀ but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site TWR and were not assessed further.

According to the Consolidated Table of Office of Environmental Health Hazard Assessment (OEHHA)/ CARB Approved Risk Assessment Health Values, the potential cancer risk from the inhalation of DPM outweighs the potential noncancer health impacts (SCAQMD, 2015; SMAQMD, 2014); therefore, noncancer health impacts of DPM were not assessed further. In addition, the OEHHA Air Toxics Hot Spots Program Guidance Manual does not recommend assessing cancer risk from exposures to a 'maximally exposed individual resident' (sensitive receptor) from activities lasting less than two months, due to the uncertainty in assessing cancer risk from very short-term exposures (OEHHA, 2015).

As discussed in Appendix B, the maximum construction activity scenario assumed at each site would have a six week duration. Similarly, the duration of the monthly test and emergency operation of backup generators at each site would be sources of short-term exposure to sensitive receptors; therefore, further assessment of the potential cancer risk of the project construction and operation is not warranted.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site TWR in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site TWR and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); groundfish (M&F-EFH)

Special Status Plants Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); California dissanthelium (*Dissanthelium californicum*; 1B.2); Catalina crossosoma (*Crossosoma californicum*; 1B.2); Catalina Island dudleya (*Dudleya virens* ssp. *Hassei*; 1B.2); Coulter's saltbush (*Atriplex coulteri*; 1B.2); decumbent goldenbush (*Isocoma menziesii* var. *decumbens*; 1B.2); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, CA-E, 1B.1); Nevin's woolly sunflower (*Constancea nevinii*; 1B.3); round-leaved filaree (*California macrophylla*; 1B.1); Santa Catalina figwort (*Scrophularia villosa*; 1B.2); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *Catalinense*; 1B.2); Santa Catalina Island currant (*Ribes viburnifolium*; 1B.2); Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *Floribundus*; 1B.2); showy island snapdragon (*Gambelia speciosa*; 1B.2); Wiggins' cryptantha (*Cryptantha wigginsii*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

None

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T); bald eagle (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S); groundfish (M&F-EFH); island rush-rose (*Crocianthemum greenei*; ESA-T, CNPS-1B.2); Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, ESA-CH, CA-E, CNPS-1B.1); round-leaved filaree (*California macrophylla*; CNPS-1B.1); Santa Catalina Island bedstraw (*Galium catalinense* ssp. *Catalinense*; CNPS-1B.2); Wiggins' cryptantha (*Cryptantha wigginsii*; CNPS-1B.2)

Designated Critical Habitat Within 500 Feet:

groundfish (M&F-EFH)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

Santa Catalina Island Open Space Easement; Coastal Resource Area (Proposed- Santa Catalina Island); SCAG Zoning - Wildlife Preserves and Sanctuaries;

Local Policy or Ordinance for Biological Resources:

Santa Catalina Island Local Coastal Program

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California sagebrush scrub [*Artemisia californica* Shrubland Alliance]; Association - *Artemisia californica*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Site TWR is located on a hill top along a steep ridge in coastal sage scrub vegetation. Island oak (*Quercus pacifica*) trees are on north-facing slopes and into broad canyons below the project site. Coastal sage scrub on the dryer habitats is dominated by coast prickly pear (*Opuntia littoralis*), coastal sagebrush (*Artemisia californica*), and toyon (*Heteromeles arbutifolia*). Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T) may occur throughout the area. Bald eagles (*Haliaeetus leucocephalus*; CA-E, CDFW-FP, USFS-S) nest on Catalina island and may occur throughout the area; project activities are not in the vicinity of potential nest sites and do not interfere with foraging habitat along the coast line. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline approximately 1 mile from the project area; Site TWR is a mountain peak location at an elevation of about 1,200 feet and no project activities would impact marine environments. This upland site does not contain sand dune habitat for beach spectaclepod (*Dithyrea maritima*; ST, 1B.1). The site does not contain habitat for California dissanthelium (*Dissanthelium californicum* 1.2), Catalina crossosoma (*Crossosoma californicum*; 1B.2), and Catalina Island dudleya (*Dudleya virens ssp hasse* CNPS 1B.1). Crossosoma and dudleya are perennials and were not observed during the habitat assessment survey. Crossosoma grows in narrow, mesic canyons and north facing cliffs. The dudleya grows on shady coastal bluff cliffs. Site lacks the coastal bluffs, grasslands or alkaline clay soils habitat needed Coulter's saltbush (*Atriplex coulteri*; CNPS-1B.2). Habitat occurs on site for the island rush-rose (*Crocotanthemum greenei*; ESA-T, CNPS-1B.2) but overgrazing and the drought would remove any evidence of its occurrence; any project activities that would increase the footprint of the existing site may impact native vegetation and potentially the island rush-rose. Habitat for Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, ESA-CH, CA-E, CNPS-1B.1) may occur in the study area and near the project site but overgrazing and drought would remove any evidence of its occurrence; there is a 2011 species occurrence record located about 1,200 feet from project site. No suitable granitic cliff habitat for Nevin's woolly sunflower (*Constancea nevinii*; CNPS-1B.3) occurs within the study area. Habitat for the round-leaved filaree (*California macrophylla*; CNPS-1B.1) occurs within the project area but overgrazing and the drought would remove any evidence of its occurrence. No suitable north facing slopes or mesic canyon habitat for Santa Catalina figwort (*Scrophularia villosa*; CNPS-1B.2) occurs within the study area. Rocky canyon habitat for Santa Catalina Island bedstraw (*Galium catalinense ssp. Catalinense*; CNPS-1B.2) may occur within the study area but overgrazing and the drought would remove any evidence of its occurrence. No mesic habitat for Santa Catalina Island currant (*Ribes viburnifolium*; CNPS-1B.2) is present within the study area. No habitat occurs within the study area for the Santa Catalina Island ironwood (*Lyonothamnus floribundus ssp. Floribundus*; CNPS-1B.2); this tree species was not observed during surveys. No suitable mesic canyon habitat for the showy island snapdragon (*Gambelia speciosa*; CNPS-1B.2) is within the study area. Potential habitat for Wiggins' cryptantha (*Cryptantha wigginsii*; CNPS-1B.2) occurs in the project area; the plant is difficult to distinguish from common species. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of Santa Catalina Island fox (*Urocyon littoralis catalinae*; ESA-E, CA-T) in the project area. Prior to initiation of construction activities, the site is to be inspected for the presence of fox dens; if a den is located no construction activities would be initiated and USFWS would be contacted no later than the next business day. Sites that may be used as hiding cover by a fox (e.g., open pipes, equipment piles) would be inspected prior to moving. Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys would verify if the island rush-rose (*Crocotanthemum greenei*; ESA-T, CNPS-1B.2), Lyon's pentachaeta (*Pentachaeta lyonii*; ESA-E, ESA-CH, CA-E, CNPS-1B.1), round-leaved filaree (*California macrophylla*; CNPS-1B.1), Santa Catalina Island bedstraw (*Galium catalinense ssp. Catalinense*; CNPS-1B.2), or Wiggins' cryptantha (*Cryptantha wigginsii*; CNPS-1B.2) is present; protect as necessary. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and

Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is located within the Proposed Santa Catalina Island Coastal Resource Area. This CRA provides unobstructed wildlife movement throughout its open spaces mainly in drainages and along ridgelines and dirt roads. The SEA also protects core populations of sensitive plant, wildlife and plant communities such as island scrub oak woodland, wetlands and ironwood forest. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Construction at the proposed Project site may conflict with policies described in California Public Resources Code Section 30240, and with specific policies contained in the Santa Catalina Island Local Coastal Plan. Construction activities on site could potentially degrade habitat values (as discussed in Impact BIO 1) in Environmentally Sensitive Habitat Areas (ESHAs), which would in turn conflict with the California Public Resources Code that precludes these ESHA impacts, and thus conflict with the Santa Catalina Island Local Coastal Plan. These conflicts would be precluded by the measures identified in Impact BIO 1. Specifically identified within the Santa Catalina Island Local Coastal Plan: • Policy 3 of the plan prohibits introduction of non-native animals to Santa Catalina Island and workers bringing pets to the site could potentially create conflict, but application of BIO MM 10, No Pets would preclude these impacts. • Policy 11 requires procedures for grading and other site procedures to minimize erosion, but BMPs to be applied at every site are designed to prevent any erosion from the site. • Proliferation of non-native weeds (considered in Policy 20) would be precluded by application of BIO MM 24, Prevent the Spread of Non-native Vegetation. Impacts associated with construction would be less than significant with mitigation. Operational activities at the site would not alter habitats, and thus would not result in any substantive conflict with existing local policies or ordinances. Impacts would be less than significant.

Mitigation Measure(s):

Incorporation of mitigation measures identified at Impact BIO-1 and application of BIO MM 10 and BIO MM 24 would preclude impacts to sensitive species, thereby avoiding or reducing construction impacts, and in turn avoiding or reducing conflicts with the Santa Catalina Island Local Coastal Plan. This would be verified by application of LU MM 1, which would require the Authority obtain a coastal development permit prior to construction at the site. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 20 Santa Catalina Island Fox Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in October 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Franciscan Complex, unit 2 (Southern California)

Stability: Moderate pending geotechnical analysis

Soil Type: Vallecitos-Thirst-Shoba Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained stony silt to gravelly loam with medium to very rapid runoff and slow permeability. Moderate to steep slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site TWR and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site TWR was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site TWR. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site TWR would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site TWR, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site TWR would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: N/A

Located in a State Fire Hazard Zone?: Yes

If yes, please explain: Located within a designated 'Very High' zone

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Santa Catalina Island Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space

Zoning: Open Space

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Catalina Island Land Use Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposal for this site is to construct a new up to 180-foot-tall lattice tower on land within the Santa Catalina Island Coastal Zone. Existing communication facilities occur at the site. The Local Coastal Plan policies discourage the siting of facilities, such as communications facilities, in high-visibility locations. New development is to be attractively designed to protect highly scenic natural or historical areas. The proposed lattice tower, sited in close proximity to existing telecommunications facilities, helps to reduce impacts by consolidating similar facilities and would be designed in recognition of the recommended actions for new development to further reduce effects. Telecommunication facilities have previously been constructed at this site, demonstrating consistency with the LCP.

The final determination of consistency would be made by the agency responsible for issuing a Local Coastal Permit. If a permit is issued, operation and maintenance of the site would occur consistent with any applicable permit conditions. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan, and plan inconsistency is not considered a significant impact.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: Santa Catalina Island Local Coastal Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Santa Catalina Island Open Space Easement

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: S Western Ave

Distance (Miles): 1.14

Disaster Route: Boat or airplane

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximate 3.8 miles from the Catalina Airport runway

Nearest Highway/Freeway: No highway/freeway on Santa Catalina Island

Distance (Miles): 0

Nearest Major Arterial: W Paseo Del Mar

Distance (Miles): 21.81

Access to the Project Site Provided Via: Extension off of Banning House Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is not within 2 miles of a route identified in the local county Congestion Management Plan. While vehicles bringing materials, equipment, or workers to these Project sites may travel on a CMP route, use of these transportation routes would be dispersed and negligible. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site TWR is approximate 3.8 miles from the Catalina Airport runway. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 180-foot-tall lattice tower with an up to 15-foot-tall lightning rod), the TOWAIR tool indicates that the antenna structure is a “pass slope determination,” which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Pebbly Beach Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: VPK

Site Name: Verdugo Peak (County)

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Unnamed road - nearest intersection Hostetter Fire Rd

City: Glendale

State: CA

Zip: 91214

Latitude: 34.2174561326

Longitude: -118.283266832

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

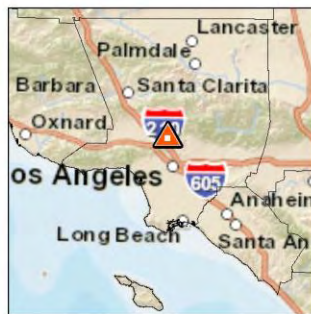
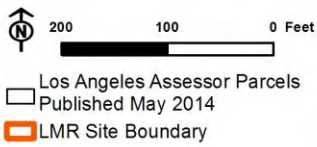
Existing Tower Type: Lattice (2?)

Existing Tower Height: 120'; 150'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3073

VPK Site Boundary Map



VPK

VPK
Hostetter Fire Rd.
Glendale, CA 91352

Proposed New Site Coordinates (NAD83):

Latitude: 34.21748
Longitude: -118.283265
Elevation (Feet): 3063

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

The site is on a hilltop and consists of two lattice towers and two one-story equipment shelter buildings of differing sizes enclosed by a chain link fence. Microwave dishes are attached to lattice towers. The site footprint is paved. Tall trees surround the site on all sides except the west. Land around the site is undeveloped and is vegetated with low chaparral shrubs and trees. A paved road provides access to the site. The existing lattice towers are the dominant vertical feature in the area.

Visual Sensitivity: Medium

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: Yes

If yes, enter recreation area name: Wildwood Canyon Park

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes lattice towers that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing towers, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and its immediate surroundings. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 5327

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site VPK. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that Nox emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site VPK or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site VPK would not exceed the SCAQMD daily significance thresholds including Nox, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of Nox from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site VPK will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site VPK would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site VPK or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site VPK, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site VPK, which is 5,327 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 7 are higher than the SCAQMD thresholds for NOx, CO, PM2.5, lower for PM10 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site VPK and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site VPK in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site VPK and all proposed Projects sites would

not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

None

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP); Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS 1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Los Angeles Co. - Henderson Canyon Open Space; Verdugo Mountains Significant Ecological Area; SCAG Zoning - Local Parks and Recreation; Natural Landscape Block - Verdugo Mountains;

Local Policy or Ordinance for Biological Resources:

City of Glendale General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Chamise chaparral [*Adenostoma fasciculatum* Shrubland Alliance]; Association - *Adenostoma fasciculatum*-*Eriogonum fasciculatum* shrubland.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site VPK is located on a hilltop in chaparral vegetation surrounded by steep slopes. The study areas considered to be outside the current range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), but as the condor population increases it is expected to expand geographically. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at developed sites. The vegetation is too dense to conduct a thorough botanical survey. However, two special status plants, Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS 1B.2) and white rabbit-tobacco (*Pseudognaphalium leucocephalum*; 2B.2) have been recorded within 2 miles of the project site. Habitat for the white rabbit-tobacco is along streams; this habitat does not occur in the project area. Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS 1B.2) is a perennial

and was not observed during the initial survey in September; however, the species was collected in the area and spring is the most appropriate season to survey for this species; suitable habitat may occur in the study area. American peregrine falcon (*Falco peregrinus anatum*; CDFW-FP) may pass through the study area while foraging, but the study area does not provide steep cliff habitat required for nesting. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

To address future use of the area by condors all trash and construction debris (especially small items such as nuts and washers) will be removed from the site; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. Conduct spring botanical surveys for Davidson's bush-mallow (*Malacothamnus davidsonii* CNPS 1B.2); if present mark the areas requiring special protection. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 12 Coastal California Gnatcatcher Protection • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes one Riverine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is restricted to ephemeral drainages. Construction activities would be limited to the Project site, and best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Verdugo Mountains Natural Landscape Block which overlaps the ranges of approximately 230 amphibian, reptile, mammal and bird species. This site is also located within the Verdugo Mountains Significant Ecological Area. This SEA provides for wildlife movement within large open spaces and within bottleneck areas where development occurs. It also provides for movement between areas outside the SEA towards the Angeles National Forest. The SEA does not specifically contain special status wildlife or plant species, it does contain restricted plant communities and the important wildlife corridors. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site VPK is located within the City of Glendale. Policy 1 of the Conservation Element of the City of Glendale General Plan (City of Glendale 1993) promotes the maintenance and restoration of natural resources. While native vegetation occurs in the study area of Site VPK, only disturbed vegetation and development occurs within the actual site boundary of the site. Ground disturbance at the site would not exceed 5,000 square feet, and substantive removal of native vegetation is not expected. As a result, any conflicts with the City of Glendale General Plan associated with construction activities at Site VPK would be minor and construction impacts at Site VPK would be less than significant. The proposed new antenna support structure at Site VPK increases the probability of a bird strike hazard, even if other towers are present. Workers accessing the site during operations for maintenance and repair activities would slightly increase the traffic count which could increase the potential to injure or kill wildlife. These operations impacts may occur to a few individual animals, however, without impacts at a landscape level. Due to the history of disturbance on these sites, the lack of protected species known to occur near the sites, and the minimal activity associated with maintenance and repair activities, operations associated the proposed project at Site VPK would have a less than significant impact on biological resources protected by the City of Glendale General Plan. Because the Authority is exercising intergovernmental immunity, the plan is not applicable and no conflict with the City of Glendale General Plan exists.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct or indirect areas of potential effects (APE). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Based on the absence of historical resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project

site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Lithic Xerorthents-Hambright-Castaic Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1 mile north of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils

reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of material ranging from well-drained very stony loam to silty clay loam with medium to very rapid runoff and moderate permeability. This soil type exhibits a well-drained, medium to very rapid runoff with slow permeability. Moderate slopes surround the site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site VPK and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site VPK was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site VPK. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site VPK would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site VPK, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site VPK would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Yes, Very High Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Glendale

General Plan Designation: Recreational/Open Space

Zoning: Special Recreation

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Glendale

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Glendale

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.36 Noise Control

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays, weekends and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range

from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would

not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Henderson Canyon Open Space

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. Site VPK is within the Henderson Canyon Open Space. Open space, like public land under federal management, may be used for recreation, but may have large expanses of land with no areas specifically designated for a concentrated recreational use. Enhancements to the existing communication facilities would not change the recreational opportunities or recreational experience. The communication site itself would preclude recreation and be a long-term permanent impact, but adjacent lands could continue to support compatible recreational uses. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Foothill Frwy

Distance (Miles): 0.13

Disaster Route: Highway 210/Foothills Freeway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 4.4 miles from the Bob Hope Airport runway

Nearest Highway/Freeway: Interstate 210

Distance (Miles): 1.14

Nearest Major Arterial: La Tuna Canyon Rd

Distance (Miles): 1.18

Access to the Project Site Provided Via: Extension off of Hostetter Fire Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site VPK is approximately 4.4 miles from the Bob Hope Airport runway. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered (in this case, proposed whip and microwave antennas mounted on a proposed 180-foot-tall lattice tower with an up to 15-foot-tall lightning rod), the TOWAIR tool indicates that the antenna structure is a "pass slope determination," which indicates the structure would not interfere with takeoff and landing operations, and does not require Federal Aviation Administration (FAA) notification based on the structure height and distance from runways. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: City of Burbank Landfill #3

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF GLENDALE

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does not meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: WAD

Site Name: Walker Drive

Site Discussion:

Propose installation of up to 20 whip and up to 5 microwave antennas on existing 120 foot monopole to be extended up to 140 feet, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose construction of up to 200 foot long x 4 foot high retaining wall. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 409 Walker Dr.

City: Beverly Hills

State: CA

Zip: 90210

Latitude: 34.1097776931

Longitude: -118.391077531

Jurisdiction:

Landowner: City of Beverly Hills

Proposed LMR Facilities

Antenna Support Structure: Existing Monopole

New Support Structure Height: Extend from 120' to 140'

If Existing Structure is being used, is it FCC Registered?: Unknown

FCC Registration Number: Unknown

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

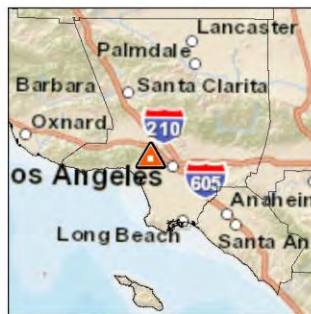
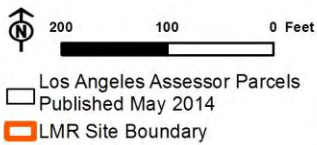
Existing Tower Type: Monopole

Existing Tower Height: 120'

Existing Site Use: Telecommunication Site/Water Tank

Existing Ground Elevation (feet AMSL): 1473

WAD Site Boundary Map



WAD

Walker Drive
 409 Walker Dr.
 Beverly Hills, CA 90210

Proposed New Site Coordinates (NAD83):

Latitude: 34.10982
 Longitude: -118.391126
 Elevation (Feet): 1477

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



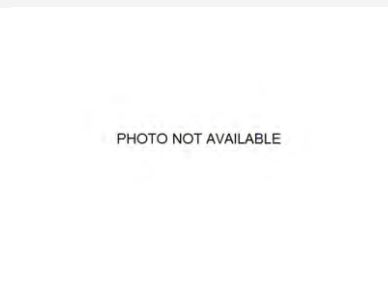
Site view looking south



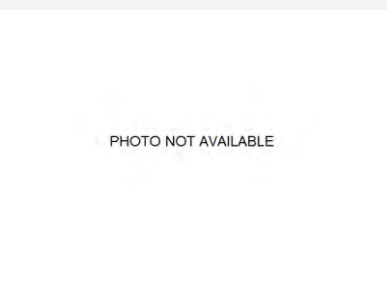
Surrounding area south of site



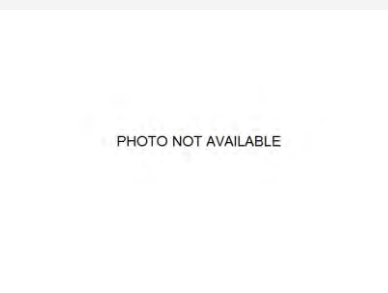
Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site consists of a large water tank, one-story pumping house, narrow lattice tower, 120-foot tall monopole, and three small equipment shelters enclosed by a chain link fence. The water tank is green with a white roof and located atop a dirt mound surrounded by deciduous trees enclosed by a black metal fence. The lattice tower and monopole are on a concrete pad immediately adjacent to the water tower. The site is located at the end of Walker Drive in a residential area. Another water tank is immediately adjacent to the site to the south and appears to be part of the same compound. This smaller water tank is sky blue and elevated on a dirt mound. Two residences abut the site boundary. Residences are single-family houses, typically one story and of various designs. The topography is hilly and varied, and the landscaping is mature and dense, including several tall trees of various species. Telephone poles line the narrow streets. Despite the height of the towers, they are only intermittently visible due to the topography and vegetation.

Visual Sensitivity: Low

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located in a residential suburban setting. The proposed new facilities would not be located in an area defined as scenic vista.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new facilities would be compatible with the existing visual character and quality, which is low, and is surrounded primarily by residences. Despite extending the height of the existing tower, the tall trees that currently surround the site and the varying topography of the area would continue to obscure most of the site from view. Construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SSCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 160

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site WAD. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site WAD or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site WAD would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site WAD will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the

contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site WAD would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site WAD or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site WAD, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site WAD, which is 160 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NOx, CO, lower for PM10, PM2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site WAD and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site WAD in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site WAD and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant

to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC); monarch butterfly (*Danaus plexippus*; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1)

Sensitive Communities Recorded within 1 Mile:

California Walnut Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

monarch butterfly (*Danaus plexippus*; ESA-Pet); pallid bat - foraging (*Antrozous palidus*; CDFW-SSC); Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Beverly Hills General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site WAD is located in the Hollywood Hills at an existing water tank/antenna location in a completely urbanized area that lacks native habitat for sensitive species. There is a steep cliff on one side of the project. It contains laurel sumac (*Malosma laurina*) and our lord's candle (*Yucca whipplei*). The lower portion of the cliff has been cemented to reduce erosion. The portion of the project area that is not developed is too steep to serve as habitat for the coast horned lizard (*Phrynosoma blainvillii*; CDFW-SSC). Monarch butterflies (*Danaus plexippus*; ESA-Pet) may migrate through the area, and may occasionally use the many tall ornamental trees within the project area for roosting. Though highly unlikely, habitat for Braunton's milk-vetch (*Astragalus brauntonii*; ESA-E, 1B.1) may be found within the project area on the steep slope below the water tanks; this location is too steep to effectively survey. No suitable habitat occurs within the project site. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries so construction debris or soils are not deposited on the adjacent slope. Check trees for roosting monarch butterflies (*Danaus plexippus*; ESA-Pet) prior to construction activities. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices (selected sites) • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 18 Nesting Bird Protection • BIO MM 22 Monarch Butterfly Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site. California Walnut Woodland does not occur within the survey area.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of West Hollywood General Plan includes an Infrastructure, Resources and Conservation Element. This element does not include measures specific to biological resources. The proposed project would not conflict with any biological policies outlined in the City of West Hollywood General Plan.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

There are no historical resources within the direct area of potential effects (APE). The WAD project area encompasses a large water tank, an existing 120-foot monopole and associated infrastructure features, all situated within the 1960s-era suburban neighborhood of Trousdale. Within the indirect APE there are eight properties recorded by the SurveyLA project (seven residences and one district). One of the residences is significant for its International-style architecture and six are significant for their mid-century modern architecture. All of the dwellings are situated at least 0.35 miles from the direct APE and beyond line-of-sight due to the intervening distance and rolling terrain, mature trees, and buildings. The eighth property (a district) is situated approximately 650 feet southeast of the direct APE and is a 100,000 square-foot facility (converted to a residence) that encompasses the former Lookout Mountain Air Force Station, which was built in 1941, but is significant for its Cold War-era missions. LMR activities at the WAD project location include attachment of whip and microwave antennas on a 120-foot monopole that is proposed to be extended to 140 feet; construction of a new equipment shelter; and installation of a new backup generator and fuel tank on a concrete pad. The status and condition of this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the extended height of the existing monopole, both the extension and additional antennas would become more visible to the surrounding historical resources and significant visual impacts would occur; however with implementation of mitigation measures (camouflage), impacts would be reduced to less than significant levels.

Mitigation Measure(s):

CUL MM 5 would be implemented at this project site. Architectural camouflage is required to minimize the visual effects of the proposed increase in the height of the monopole on identified historical resources within the indirect APE.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical investigation

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: Low

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: Yes

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be collocated to existing lattice structure, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards such as landslides prior to issuance of a building permit. Existing structures were built in accordance with current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or other geologic hazards would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained light clay loam with low to very high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Beverly Hills planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential liquefaction, or potential land subsidence area. The site does lie within a potential landslide zone area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking and evaluate the potential for landslides and appropriate measures to reduce and/or eliminate that hazard associated with landslides. GMED may require additional design requires such as retaining walls, buttresses, piles, or additional site grading to reduce the potential for landslide. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant for this site.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site WAD and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site WAD was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site WAD. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site WAD would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site WAD, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site WAD would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: West Hollywood Sheriff's Heliport

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage

Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: There is one permitted UST within a 1/4 miles of the proposed site. The UST is down gradient from the site.

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: LMR located in Very High Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC

plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open

areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced, and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If

runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Beverly Hills

General Plan Designation: Single Family Residential – Low Density

Zoning: One Family Residential Zone

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Beverly Hills

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

The proposed facilities at this site may be inconsistent with the Los Angeles County General Plan policy to avoid severe hazard areas, including geologic and fire hazards, and the policy to protect areas that have significant natural resources. However, no physical impact would occur as a result of an inconsistency between the proposed project and the policy, and this is not considered a significant impact. As discussed in Sections 3.5 (geologic and soil hazards), Section 3.7 (fire hazards), Section 3.3 (biological effects), as well as in a site-by-site assessment in Chapter 4, significant physical impacts to these resources would be mitigated to less than

significant.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Beverly Hills

Applicable Noise Ordinance: Title 5; Chapter 1; Article 2; Section 5

Noise Level Threshold: N/A; no construction from 6 pm to 8 am on weekdays and Saturdays or at any time on Sundays and holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 55 dBA

Sensitive Noise Receiver 1: Single Family Residential Dwellings

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. Sensitive receivers (single-family dwellings) are located within 25 feet of Project site WAD; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site WAD, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.

- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 dBA and not exceed the 90 dBA daytime criterion but would exceed the 80 dBA nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

• Prior to commencement of construction at Se WAD, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime threshold. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Los Angeles City Water Resources Parkland

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Santa Monica Blvd

Distance (Miles): 2.03

Disaster Route: Santa Monica Boulevard

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Hollywood Frwy

Distance (Miles): 1.62

Nearest Major Arterial: Mulholland Dr.

Distance (Miles): 0.68

Access to the Project Site Provided Via: Walker Drive

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. Construction-related traffic would be less than 1 percent of the average daily traffic in this area.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: City of Burbank Landfill #3

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF BEVERLY HILLS

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: WMP

Site Name: Whitaker Middle Peak

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Whitaker Fire Rd; Angeles National Forest

City: Castaic Lake

State: CA

Zip: 91384

Latitude: 34.5693685526

Longitude: -118.740247459

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

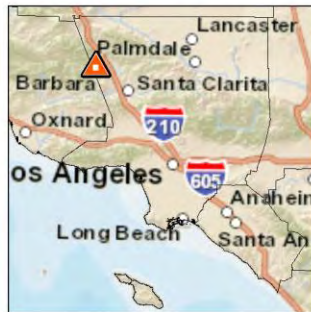
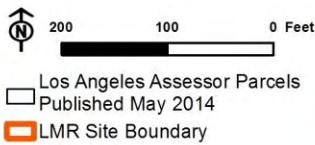
Existing Tower Type: Lattice

Existing Tower Height: unknown

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 4116

WMP Site Boundary Map



WMP

Whitaker Middle Peak
 Angeles National Forest - 6N53 Whitaker Peak Rd.
 Unincorporated, CA 91384

Proposed New Site Coordinates (NAD83):

Latitude: 34.569237
 Longitude: -118.740661
 Elevation (Feet): 4098

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This isolated site is located adjacent to Whitaker Peak Road in Angeles National Forest on an undeveloped hilltop consisting of low grassy vegetation on all sides. The site includes a small, one-room one-story structure, lattice tower of unknown height, weather tower, and associated equipment (e.g., propane tank) enclosed by a chain link fence. This site is not visible from sensitive vantage points. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Developed Area. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Developed Area

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new facilities would be located within a site that includes a lattice tower that already creates a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and its immediate surroundings. There would be no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. Impacts to visual resources from construction activities would be minor and temporary.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SSCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 37113

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site WMP. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site WMP or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site WMP would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site WMP will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the

contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site WMP would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for Nox and could result in cumulatively considerable net increases in O3 from the Nox emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site WMP or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor Nox and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site WMP, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site WMP, which is 37,113 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site WMP and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site WMP in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site WMP and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub; Valley Oak Woodland; California condor critical habitat (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); California red-legged frog critical habitat (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC)

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, CA-E, CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC); slender mariposa-lily (*Calochortus clavatus* var. *gracilis* 1B.2)

Designated Critical Habitat Within 500 Feet:

California red-legged frog (*Rana draytonii*; ESA-T, ESA-CH, CDFW-SSC)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning- Wildlife Preserves and Sanctuaries; Natural Landscape Block - Pine Mountain/Sespe Condor;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Bigberry manzanita chaparral [*Arctostaphylos glauca* Shrubland Alliance]; Association - *Arctostaphylos glauca*-*Adenostoma fasciculatum*.

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site WMP is located on a high peak along a ridgeline in the San Gabriel Mountains. Slopes are steep and the vegetation is primarily chamise chaparral. Diagnostic woody shrubs include chamise, manzanita, bush buckwheat and bush poppy (*Romneya coulterii*). The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and designated critical habitat is approximately 0.2-miles to the west. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the

project site and few if any anti-perch devices have been installed on these structures. The proposed developments include the addition of a new lattice tower would could be used as perches by condors. The project site is within designated critical habitat for the California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC), critical habitat unit VEN-2 (Piru Creek). Though the project site is located on a steep mountain peak and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. On-site construction activities and travel on the long, unimproved access road could impact frogs, if present. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area and along the length of the access road. A biological monitor will be present during construction; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. To protect dispersing California red-legged frog, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measurable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project area. Valley Oak Woodland was not observed in the project area. Site WMP is within and hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) critical habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Pine Mountains/Sespe Condor Natural Landscape Block which overlaps the ranges of approximately 246 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes,

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant. There are no other historical resources within the direct or indirect APEs. The WMP project location encompasses an existing communications site, that includes a lattice tower, equipment shelter, and associated infrastructure features situated on a heavily disturbed area with patchy vegetation, all secured by a chain-link fence. The only other structures within the indirect APE are associated with an adjacent communications site (approximately 370 feet southwest of the direct APE); the remainder of the indirect APE encompasses undeveloped mountainous terrain. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 100-foot lattice tower, construction of a new equipment shelter, and installation of a new backup generator and fuel tank on a concrete pad. The status and conditions at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the nature of the project site and the identified resource, impacts

from project activities would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features associated resource features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Mesozoic granitic rocks, unit 3 (Sierra Nevada, Death Valley area, Northern Mojave Desert and Transverse Ranges)

Stability: Moderate pending geotechnical analysis

Soil Type: Vista-Cieneba-Andregg Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1.25 miles northeast of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the

Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained gravelly to coarse sandy loam with slow to rapid runoff and moderately rapid permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site WMP and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site WMP was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site WMP. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site WMP would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site WMP, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site WMP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Whitaker Ridge is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Golden State Frwy

Distance (Miles): 0.63

Disaster Route: Interstate 5

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 2.03

Nearest Major Arterial: Sloan Canyon Rd

Distance (Miles): 8.32

Access to the Project Site Provided Via: Extension off of Whitaker Peak Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: WS1

Site Name: 100 Wilshire

Site Discussion:

Propose installation of up to 25 whip and up to 7 microwave antennas on roof top of existing building without exceeding current overall height of the structure including appurtenances. Propose indoor equipment racks to be located in room in existing building, or in a new up to 600 square foot shelter on building roof, or up to 600 square foot shelter on adjacent grounds (prefab or CMU). Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank adjacent to the building.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 100 cubic yards removed

Proposed trenching for underground conduits to accommodate power and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide

Proposed foundations include:

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 100 Wilshire Blvd

City: Santa Monica

State: CA

Zip: 90401

Latitude: 34.0168473476

Longitude: -118.500475683

Jurisdiction:

Landowner: Douglas Emmit 1998 LLC.

Proposed LMR Facilities

Antenna Support Structure: Rooftop

New Support Structure Height: N/A

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

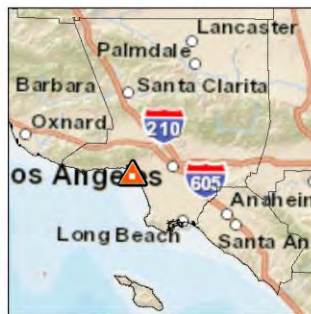
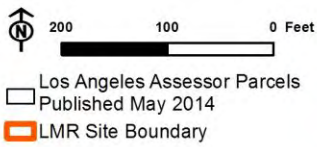
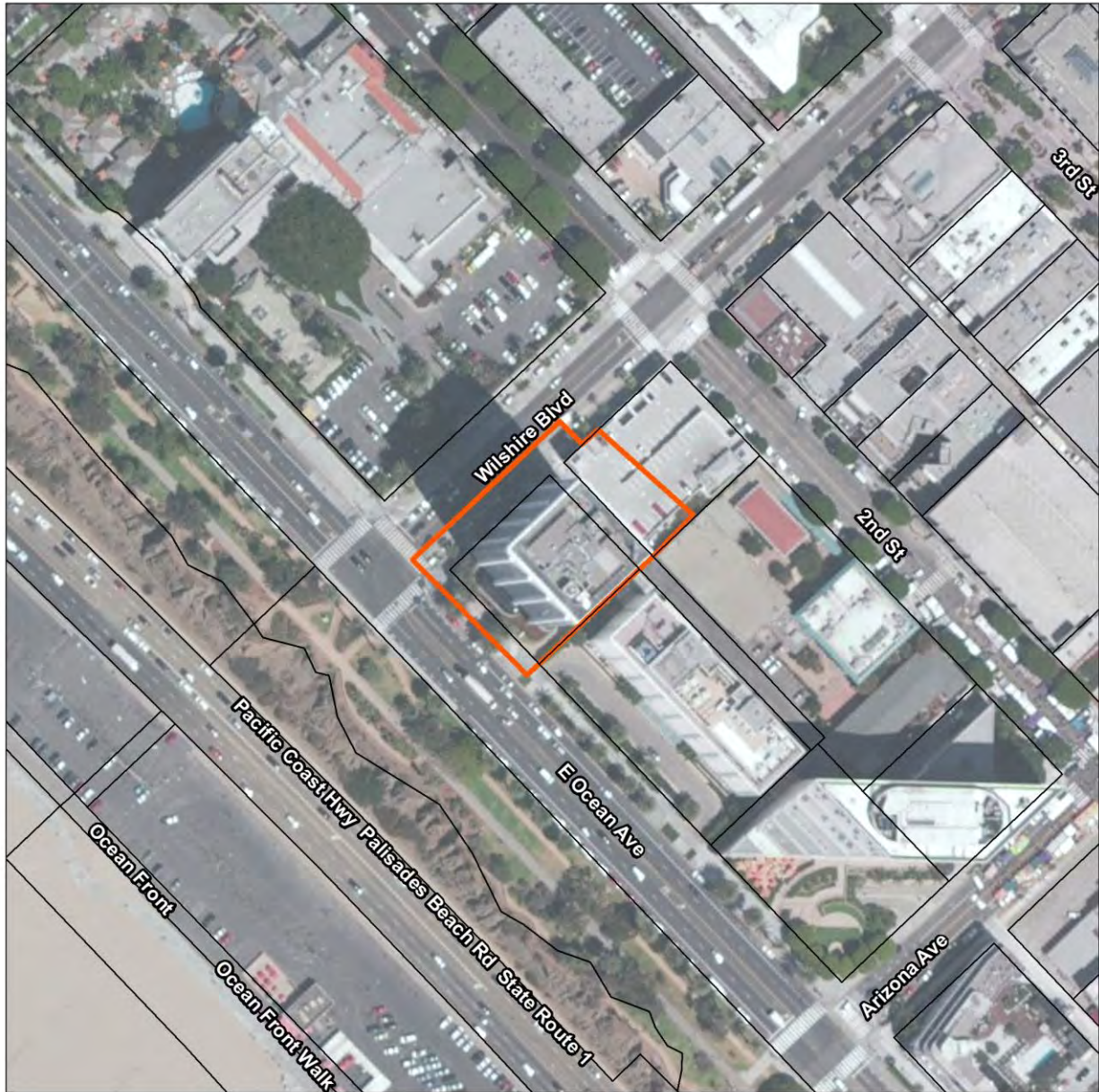
Existing Tower Type: N/A

Existing Tower Height: N/A

Existing Site Use: Commercial Building

Existing Ground Elevation (feet AMSL): 92

WS1 Site Boundary Map



WS1

100 Wilshire
 100 Wilshire Blvd.
 Santa Monica, CA 90401

Proposed New Site Coordinates (NAD83):

Latitude: 34.016874

Longitude: -118.500579

Elevation (Feet): 93

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is within the coastal zone on a high-rise (320 feet) office building in a highly developed urban area within the City of Santa Monica along Ocean Boulevard, a 5-lane road that fronts the ocean and Palisades Park. Palisades Park is a slender, 26-acre park with “breathtaking views of the Bay,” which stretches from Palos Verdes Peninsula to Malibu (SMMC 2014). The Pacific Coast Highway (PCH) (State Route 1) parallels Ocean Boulevard approximately 200 feet from the building adjacent to Santa Monica State Beach. This highway is also approximately 20 to 30 feet below the office buildings, which are blocked from view by a vertical cut slope. The PCH is a major north-south state highway that travels most of the Pacific coastline in California. The PCH is a designated “All-American Road” and is among the nation's most scenic. Views to the southwest are of the ocean, interrupted by occasional palm trees and other deciduous landscaping located within a greenbelt that parallels the beachfront. Similarly tall buildings exist in the vicinity, although this structure is one of the tallest, blocking ocean views for structures behind it. Views to the northwest and southeast are of the boulevard with similar vegetation and structures, such as hotels. Views to the northeast are of the city, consisting of restaurants, hotels, and retail and office buildings. Sensitive viewers are highway travelers and visitors to downtown.

Visual Sensitivity: High

On federally administered public lands: No

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, City of Santa Monica Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Pacific Coast Highway

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located in a commercial urban setting on the rooftop a high-rise (320 feet) modern office building that is surrounded by other high-rise buildings and other modern buildings of varying heights. Microwave and whip antennas would be mounted to the existing penthouse exterior walls. The new antennas would not be of sufficient size to have a substantial adverse effect on a scenic vista, including views from Pacific Coast Highway, some of which would be blocked by the steep cut banks along the road in this area. Associated equipment would be housed inside the existing buildings. The low level of impact would help protect views to and along the ocean and scenic coastal areas as called for within the coastal zone. Construction impacts would be limited to trucks transporting personnel, materials, and tools to the building. Equipment, materials, and tools would be hand-carried to the roof using freight elevators. A helicopter would be used to deliver materials to the rooftop if necessary. This short-term impact would not affect scenic vistas given the height of the building and temporary nature of the delivery.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is located in a commercial urban setting on a high-rise (320 feet) modern office building that is surrounded by other high-rise buildings. No scenic resources (trees, rock outcroppings) exist on the rooftop and no historic buildings are present. There would be no alteration of natural forms.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Antennas of similar height already exist on the rooftop, and are not visible from ground level given the height of the building. Similarly, the new antennas would also be obscured from view, and would be compatible with the visual character of the existing site and the commercial setting. The same construction activities described for scenic vistas, described above, would also apply, with only possible temporary disruption due to helicopter delivery of materials.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. The site is in an urban area. The proposed Project facilities would be roof mounted or collocated and constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. No additional lighting would be required. This would not result in a substantial new source of day or nighttime light or glare that would adversely affect nighttime views of the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SSCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Hotel

Distance to Sensitive Receptor: 99

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site WS1. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site WS1 or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site WS1 would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site WS1 will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100

pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site WS1 would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site WS1 or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site WS1, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site WS1, which is 99 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds for NO_x, CO, lower for PM₁₀, PM_{2.5} but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site WS1 and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site WS1 in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site WS1 and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly

trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

bank swallow (*Riparia riparia*; CA-T); least Bell's vireo (*Vireo bellii pusillus*; ESA-E, CA-E); monarch butterfly (*Danaus plexippus*; ESA-Pet); Swainson's hawk (*Buteo swainsoni*; CA-T); two-striped garter snake (*Thamnophis hammondi*; CDFW-SSC); western mastiff bat (*Eumops perotis californicus*; CDFW-SSC); groundfish (M&F-EFH)

Special Status Plants Recorded within 1 Mile:

beach spectaclepod (*Dithyrea maritima*; CA-T, 1B.1); coastal dunes milk-vetch (*Astragalus tener* var. *titi*; ESA-E, CA-E, 1B.1); Parish's brittlescale (*Atriplex parishii*; 1B.1); salt marsh bird's-beak (*Chloropyron maritimum* ssp. *Maritimum*; ESA-E, CA-E, 1B.2); Salt Spring checkerbloom (*Sidalcea neomexicana*; 2B.2); southern tarplant (*Centromadia parryi* ssp. *Australis*; 1B.1); Ventura Marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*; ESA-E, CA-E, 1B.1)

Sensitive Communities Recorded within 1 Mile:

western snowy plover critical habitat (*Charadrius alexandrinus nivosus*; ESA-T; ESA-CH, CDFW-SSC);

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

None

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

None

Local Policy or Ordinance for Biological Resources:

City of Santa Monica General Plan

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site WS1 is located in a completely urbanized area and does not contain native vegetation or natural habitats. Coastal beaches, intensively used by recreationists, are within 0.1-miles on the opposite side of the Pacific Coast Highway. Proposed construction is on the roof of a high-rise building separated from coastal beaches by Pacific Coast Highway. Landscape vegetation occurs within the 500-foot diameter project area between Ocean Avenue and the Pacific Coast Highway. No habitats of any special status plant or wildlife species are present. Western snowy plover (*Charadrius alexandrinus nivosus*; ESA-T; CDFW-SSC) designated critical habitat is associated with

beaches on the opposite side of the Pacific Coast Highway approximately 0.5-miles to the northwest. No suitable habitat or designated critical habitat in the project area. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline approximately 0.25-miles from the project site; no project activities will impact marine environments. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

None required.

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project area includes one Estuarine and Marine wetland feature type as indicated by the National Wetland Inventory (USFWS 2014). However, this wetland type is located at the Santa Monica State Beach. However, construction activities would be limited to the project site which is isolated from these drainages by the Pacific Coast Highway, urban storm water management, and that construction activities would be on the roof of a high-rise building.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The City of Santa Monica General Plan includes a Conservation Element adopted in 1975. This element does not include measures specific to biological resources. The proposed project would not conflict with any biological policies outlined in the City of Santa Monica General Plan.

Mitigation Measure(s):

None required.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: No

Architectural: Yes

Native American: No

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

Yes

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources within the direct area of potential effects (APE). This project location encompasses the rooftop area of 100 Wilshire Boulevard, a 300-foot-tall office building that was completed in 1971. The rooftop area consists of a recessed equipment penthouse with numerous communications antennas already affixed, a variety of infrastructure items, and numerous other standalone cameras and communications equipment. Within the indirect APE, there are approximately 275 recorded resources, some of which are individually eligible historical resources and historic districts. LMR activities proposed for this project location solely involve the placement of indoor equipment within an existing equipment room of the rooftop penthouse and attaching whip and microwave antennas to the façade of the existing equipment penthouse. No ground disturbance or other equipment is proposed. At ground level, the closest of the historical resources to the building at 100 Wilshire Boulevard are Resource No. P-19-178135, a historic district (Central Business District), which is approximately 300 feet to the northwest; Resource No. P-19-188768, the 3rd St. Promenade, which is approximately 500 feet to the northeast; and Resource No. P-19-177901, 1333 Ocean Avenue, which is approximately 900 feet to the southeast. This was confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the height of this building and the array of existing antennas, the proposed additional antennas would not be visible from the ground level or introduce out-of-character visual elements at this location; therefore there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no historical resources (archaeological) within the direct or indirect areas of potential effects (APEs); therefore, the project would not cause a substantial adverse change in an archaeological resource. Based on the absence of historical resources (archaeological), there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The area is mapped as Quaternary older alluvium, which has a moderate potential for significant vertebrate fossils from the late Pleistocene. No localities are recorded within the proposed site; however, vertebrate fossil localities have been recorded from this geologic unit in the vicinity. Recovered fossils include extinct lion collected from a depth of six feet and specimens of extinct horse and ground sloth from depths of 11 feet. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Paleontological monitoring will be undertaken during excavation into the Quaternary older alluvium to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Quaternary alluvium and marine deposits

Stability: Moderate

Soil Type: Urban land-Sorrento-Hanford Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 1.5 miles northwest of the property (Santa Susana) (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). Antennas would be located on the roof of the existing building, therefore a geotechnical study for new structures is not required. All structures in southern California are located within an area subject to seismic shaking. The UBC and CBC have specific design requirements to reduce or eliminate the effects of seismic shaking. Permitting processes are required to evaluate and mitigate other geologic hazards such as landslides prior to issuance of a building permit. Existing structures were built in accordance with

current UBC and CBC at the time of construction. Therefore, the effects of seismic shaking or liquefaction would be less than significant.

Mitigation Measure(s):

None required.

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of well-drained fine sandy loam with negligible to low runoff and moderately rapid permeability. The site is located on flat grade in an urban environment. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Santa Monica planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing storm drains inlets.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located in an urban area and antenna are to be located at the roof of existing building. No new structures would be built to support the antenna. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site WS1 and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site WS1 was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site WS1. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site WS1 would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site WS1, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site WS1 would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: Yes

If yes, please explain: LMR Site is within 1/4 mile of 1 permitted UST

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The project site is not within a designated Fire Hazard Severity Zone.

Mitigation Measure(s):

None required.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No *Note: Flood Inundation Area 240 feet southwest of proposed location

Groundwater Basin: Coastal Plain Of Los Angeles

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation would not be required at the site therefore dewatering would not be necessary. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If

runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: City of Santa Monica Coastal Zone

Is the site located within a Airport Land Use Plan area?: No, but the site is approximately 13,100 feet from Santa Monica Municipal Airport

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Santa Monica

General Plan Designation: OSD (unknown)

Zoning: Residential-Visitor Serving Commercial District

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

None identified

Comprehensive Plan or General Plan Local Agency: Santa Monica

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site involves mounting antennas on an existing telecommunications structure and would not convert land for a new purpose. No conflict with city planning documents, policies, or zoning ordinances was identified.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Santa Monica

Applicable Noise Ordinance: Article 4 Public Welfare, Morals, and Policy, Chapter 4.12 Noise

Noise Level Threshold: 70 dBA from 10 pm to 7 am and 80 dBA from 7 am to 10 pm; no construction from 6 pm to 8 am on weekdays, 5 pm to 9 am on Saturdays, or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: Santa Monica Municipal Airport

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 60 dBA

Sensitive Noise Receiver 1: hotel with roof top pool

Sensitive Noise Receiver 2: First Presbyterian Church

Sensitive Noise Receiver 3: recreation area

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. A sensitive receiver (hotel) is located within 25 feet of Project site WS1; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.

- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The ambient noise level at this site was estimated to be 60 dBA. This value represents a daily average while the construction noise levels would be temporary and intermittent.

The City of Santa Monica ordinance sets a maximum 20 Dba temporary increase above maximum exterior noise standards, which are defined during weekdays as 60 Dba for a fifteen-minute duration during daytime hours (7 a.m. To 10 p.m.) and 50 Dba for a fifteen-minute duration during nighttime hours (10 p.m. To 7 a.m.) for construction activities. The City also prohibits weekday construction after 6 p.m. And before 8 a.m.

The highest noise levels estimated at receivers located within 25 feet of proposed sites would be 89 Dba during the demolition phase of construction. Within the City of Santa Monica jurisdiction, the closest ground-level receiver, a church, is located within 55 feet of the proposed Project site WS1. A hotel is located within 25 feet of the proposed site but the nearest sensitive receiver at the hotel is a rooftop pool, which is further away than the church. Temporary short duration daytime noise exposure at the church during the demolition construction phase would be 82 Dba, which would be higher than 20 Dba above allowable short duration daytime and nighttime thresholds; therefore, construction of the project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and impacts in the City of Santa Monica would be significant absent mitigation.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

Prior to commencement of construction at site WS1, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in the City of Santa Monica noise ordinance. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI MM 3

Prior to commencement of construction at any site with an applicable noise ordinance where construction activities are necessary outside the specified hours in the ordinance, the Authority shall apply for and obtain variances from the agency with jurisdiction at that site.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

This site is located within two miles of a public airport (Santa Monica Airport), but outside of the 65 dBA CNEL developed by the airport land use plan. Estimated construction noise levels for all other proposed Project sites would be below the 90-dBA FTA threshold where adverse community reaction could occur during daytime hours but would exceed the 80-dBA nighttime threshold. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, this proposed Project location is not located in a jurisdiction with a noise ordinance that is applicable to the Authority. Therefore, it is anticipated that construction of this site would not expose people to excessive noise levels. Impacts from construction of the Project would be less than significant.

After construction, this site will be unmanned during operation except for occupational maintenance, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs. Noise from maintenance activities, which includes an estimated 58 dBA at 21 feet during the monthly backup generator during testing, would not be substantially different from existing levels, except for new sites in rural locations, where ambient noise levels would be closer to 45 dBA, and would generally occur less than once per week during daytime hours between 8:00 a.m. and 6:00 p.m. on weekdays and 9:00 a.m. and 5 p.m. on Saturdays, consistent with the City of Santa Monica noise ordinance. Operation of the Project, including the HVAC system and emergency generator, would result in noise emissions below 60 dBA and would be considered “normally acceptable” for outdoor residential exposure. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels. Impacts from operation of the Project would be less than significant.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: City of Santa Monica Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Wilshire Blvd

Distance (Miles): 0

Disaster Route: Wilshire Boulevard or Highway 1/Pacific Coast Highway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: Approximately 13,100 feet from the Santa Monica Municipal Airport runway

Nearest Highway/Freeway: Santa Monica Frwy

Distance (Miles): 0.04

Nearest Major Arterial: Wilshire Blvd

Distance (Miles): 0

Access to the Project Site Provided Via: Wilshire Boulevard

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site WS1 is approximately 13,100 feet from the Santa Monica Municipal Airport runway. The Federal Communications Commission (FCC) landing slope facility calculator (TOWAIR on-line tool) allows antenna structure owners to determine whether their structures are close enough to an airport or heliport to require an aeronautical study by the Federal Aviation Administration (FAA) and registration with the FCC. Based on the data entered for Site WS1, the TOWAIR tool indicates that the antenna structure (in this case, antennas mounted on the roof of an existing building) meets the 6.10-meter (20-foot) rule criteria. This means that FAA notification is not required if the antenna structure is 6.10 meters (20 feet) or less in height, unless the antenna structure would increase the height of another antenna structure. No impacts to aviation flight safety are anticipated.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: CITY OF SANTA MONICA

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Dewatering would not be required for building mount or collocation sites because groundwater is not expected at the shallow depths of excavation associated with this activity. Wastewater treatment plants in the project would not be affected during construction. During operations, the project would not result in the production of any wastewater that would require treatment.

Mitigation Measure(s):

None required.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: WTR

Site Name: Whittaker Ridge

Site Discussion:

Propose installation of up to 40 whip and up to 9 microwave antennas on new lattice tower up to 180 feet tall, with additional up to 15 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 4,000 square feet

Excavation: Up to 600 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 36 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 50 foot x 50 foot x 5 foot concrete slab with up to 10 foot deep x 3 foot diameter concrete piers for tower foundation; or pier foundation consisting of up to 6 foot diameter x up to 70 foot deep concrete piers under each leg.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: Whitaker Fire Rd; Angeles National Forest

City: Castaic Lake

State: CA

Zip: 91384

Latitude: 34.5839995098

Longitude: -118.721806973

Jurisdiction:

Landowner: US Government, United States Forest Service

Proposed LMR Facilities

Antenna Support Structure: New Lattice Tower

New Support Structure Height: up to 180'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: Yes

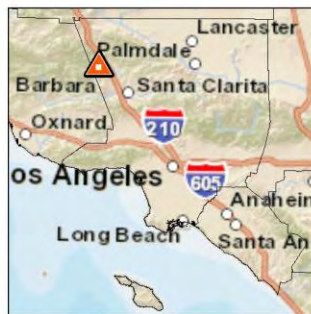
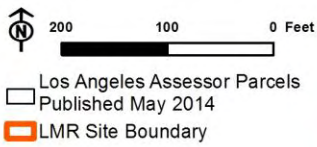
Existing Tower Type: Lattice

Existing Tower Height: 100'

Existing Site Use: Telecommunication Site

Existing Ground Elevation (feet AMSL): 3711

WTR Site Boundary Map



WTR

Whittaker Ridge
 Angeles National Forest - 6N53 Whittaker Peak Rd.
 Unincorporated, CA 91384

Proposed New Site Coordinates (NAD83):

Latitude: 34.584
 Longitude: -118.721876
 Elevation (Feet): 3706

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

This site is located in Angeles National Forest on Whitaker Ridge Road on an undeveloped hilltop consisting of low grassy vegetation on all sides. The site includes a small, one-room one-story structure and a lattice tower enclosed by a chain link fence. The existing tower is visible from 8-lane Highway 5/183 to the east. The view from the highway is dominated by the roadway corridor and primarily undeveloped ridge tops covered with chaparral vegetation. The USFS has designated this area as having a high (unaltered) scenic integrity objective (SIO). Minor under-achievement of SIOs is allowed with Forest Supervisor approval at the project level. Temporary drops of SIO levels would occur during and immediately following project implementation (USFS 2005a, b). The USFS has designated the Scenic Attractiveness Classes (SAC), which is the scenic importance of a landscape based on human perceptions of intrinsic beauty, for this area as B. SAC B is considered typical; 74% of Angeles National Forest is rated B (USFS 1995). The USFS zone for this area is Developed Area. The site is also a USFS Designated Communication Site, which allows for such use on national forests except when identified as not suitable because of law, national or regional policy, or the revised forest plan (USFS n.d.1).

Visual Sensitivity: High

On federally administered public lands: Yes, U.S. Forest Service

If yes, enter applicable ratings: High SIO/SAC B; Developed Area

Within the California coastal zone boundary: No

Adjacent to designated scenic highway or regional trail system: No

If yes, enter name of scenic corridor: N/A

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the proposed new facilities would be located within a site that includes a lattice tower that already creates a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing tower, which would attenuate the noticeability of new structures. In addition, locating the new tower and equipment with existing structures would concentrate the impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. Because of its location on a ridge top, the new facilities would not block or remove views of the scenic vista; rather, they would become part of them. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No impact would occur because the proposed project site is not within a scenic highway corridor, and no scenic resources would be substantially damaged.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing scenic attractiveness for this site is designated B, which is considered typical. The existing visual character and quality of the site and its surroundings are impacted by the presence of existing towers. Although the new lattice tower and associated equipment would contrast and be incompatible with the visual character of the surrounding landscape, they would be compatible with the existing site and its immediate surroundings. There would be no change to the site's scenic attractiveness rating. In addition, the site is located on a USFS Designated Communication Site, which generally allows for such use within the area's landscape. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in a rural/remote area. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. Sites located in more rural areas with less development experience light intrusions from occasional vehicle headlights, rural residences and buildings, and distant city lights. Sites located in more remote areas experience light intrusions from overhead airplane lights, occasional vehicle headlights, and sky glow from distant urban areas. Tower lighting is intended to be visible to pilots for purposes of aircraft operations safety, and would not result in illumination of areas not currently illuminated. Based on the nature of tower safety lighting (LED white or red solid or blinking lights), it would not introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO2

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SSCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Single family home

Distance to Sensitive Receptor: 9519

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site WTR. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOx emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOx emissions limits. With

implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant. Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site WTR or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**Construction Impact:** Significant Impact Reduced to Less than Significant with Mitigation Incorporated**Operational Impact:** Less than Significant**Discussion:**

Emissions from the construction of proposed site WTR would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site WTR will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the

contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site WTR would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site WTR or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site WTR, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site WTR, which is 9,519 feet from the nearest receptors, the LSTs for criteria pollutants are higher than the SCAQMD thresholds for Nox, CO, lower for PM10, PM2.5 but still above the estimated daily emissions from daily construction and operational activities. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site WTR and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site WTR in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site WTR and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators

and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

No mitigation measures are required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC)

Special Status Plants Recorded within 1 Mile:

slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; 1B.2)

Sensitive Communities Recorded within 1 Mile:

Southern Coast Live Oak Riparian Forest; Southern Sycamore Alder Riparian Woodland; Southern Willow Scrub; Valley Oak Woodland

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC); slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; 1B.2)

Designated Critical Habitat Within 500 Feet:

None

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

None

Wildlife Corridor or Nursery Site:

US Forest Service - Angeles National Forest; SCAG Zoning- Wildlife Preserves and Sanctuaries; Natural Landscape Block - Pine Mountain/Sespe Condor;

Local Policy or Ordinance for Biological Resources:

Biological resources are managed under the Angeles National Forest Land Management Plan.

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

California buckwheat scrub [*Eriogonum fasciculatum* Shrubland Alliance].

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Discussion:

Site WTR is located at a high point along Whitaker Ridge in the Santa Monica Mountains. The site contains chamise chaparral on the north-facing slopes and coastal sage scrub on the south-facing slopes. The study area is within the foraging range of the California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP), and designated critical habitat is approximately 1.5-miles to the west. Condors will perch on tall man-made structures, which can contribute to the bird's habituation to human presence; condors may consume "micro-trash" items (e.g., screws, washers, glass, brightly colored objects) often found at construction sites. Several communication towers and facilities are present at and near the project site and few if any anti-perch devices have been installed on these structures. The proposed developments include the addition of a new lattice tower would could be used

as perches by condors. California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) critical habitat is 1.5 miles southwest (critical habitat unit VEN-2, Piru Creek). Though the construction site is located on a steep mountain peak and no aquatic/riparian habitat occurs in the project area, frogs have been reported to disperse overland, regardless of topography, distances of up to 2 miles during rainy periods. On-site construction activities and travel on the long, unimproved access road could impact frogs if present. The site contains potential habitat slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; 1B.2). Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities. New lattice tower that may require lighting presents collision hazard for migratory birds; construction and design of the tower meets guidelines of USFWS Office of Migratory Birds.

Mitigation Measure(s):

Construction crews are to participate in environmental awareness instruction and be informed of the possible presence of slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; 1B.2) and California condor (*Gymnogyps californianus*; ESA-E, ESA-CH, CA-E, CDFW-FP); and California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) in the project area and along access roads. A biological monitor will be present during construction; all trash and construction debris (especially small items such as nuts and washers) will be removed from site each day; anti-perch devices would be affixed to any elevated, horizontal structures suitable for perching by raptors, ravens, vultures, or other large birds; all workers shall avoid any interaction with condors and shall immediately stop work if condors are present in the project area; the contractor shall prepare plans and implement spill containment measures; all wires, cables, and other items that could entangle a condor are to be securely fastened down or removed from site. To protect dispersing California red-legged frog, no on-site construction activities, or construction-related travel on access roads will occur during the night or during rainy periods (within 24 hours of a measurable [0.01 inch] precipitation event, or within 48 hours of a major [0.1 inch] precipitation event). Manage trenches so as not to trap wildlife. Minimize disturbance to natural vegetation; prior to construction, mark the construction disturbance limits and monitor for adherence to these boundaries. Stay on existing roads. Conduct spring botanical surveys for mariposa lily; if present mark the areas requiring special protection. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 4 Site Sanitation • BIO MM 5 Hazardous Materials Management • BIO MM 6 Anti-perch Devices • BIO MM 7 California Condor Protection • BIO MM 8 Biological Monitoring • BIO MM 9 Protect Native Vegetation and Common Wildlife • BIO MM 10 No Pets • BIO MM 11 Site Access • BIO MM 17 Raptor Protection • BIO MM 18 Nesting Bird Protection • BIO MM 19 Trenches and Holes Management • BIO MM 21 Protected Amphibian Protection • BIO MM 23 Prevent the Spread of Nonnative Vegetation • BIO MM 24 Special Status Plants Surveys and Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no riparian habitats or other sensitive natural community within 500 feet of the project area. Valley Oak Woodland was not observed in the project area. Site WTR is hydrologically connected to stream habitats that include California red-legged frog (*Rana draytonii*; ESA-T; CDFW-SSC) critical habitat.

Mitigation Measure(s):

None required.

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no indicators of Waters of the U.S., other wetlands, or water features with characteristics of wetlands, as defined by the Federal Clean Water Act or the State of California, present within 500 feet of the project site.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The site is located within the CDFW's designated Pine Mountains/Sespe Condor Natural Landscape Block which overlaps the ranges of approximately 246 amphibian, reptile, mammal and bird species. However, the proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Final determination of consistency with the Angeles National Forest LMP would be made by the USFS. Construction would result in ground disturbance that could increase the potential for introduction or spread of invasive species. This would conflict with Goal 2.1 of the ANF LMP. Additionally there is a potential to impact individual species at this site. This would conflict with Goal 6.2 of the ANF LMP.

Mitigation Measure(s):

See Impact BIO 1 for applicable mitigation measures.

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: Yes, U.S. Forest Service. See Impact analysis, CUL-1.

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: Yes

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: No

Unique Paleontological/Geological Resources: No

Sensitive for Human Remains within the Direct / Indirect APE:

No

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. The direct APE encompasses a single communications site that includes a lattice tower, equipment shelter, and associated infrastructure all enclosed within a chain-link fence. The remainder of the project area (direct and indirect APEs) consists of undeveloped mountains terrain; there are no other buildings or structures and no other historical resources within this project area. LMR activities at this project location include the attachment of whip and microwave antennas on a proposed 180-foot lattice tower, construction of a new equipment shelter, and installation of new backup generator and fuel tank on a concrete pad. The status and conditions at this project area were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in December 2014. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any resource-associated features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Less than Significant Impact

Indirect / Visual Impact: Less than Significant Impact

Discussion:

There is one historical resource within the direct and indirect areas of potential effects (APEs) (P-19-186535). P-19-186535 is considered a historical resource and is eligible for protection under CEQA for its cultural value as the first national forest created in California. The 346,000-acre mountainous area is California Registered Historical Landmark No. 717 and was dedicated as the San Gabriel Mountains National Monument on October 10, 2014. Both the direct and indirect APEs are completely encompassed by this California Landmark. Given the enormous size and scale of Resource P-19-186535, the small footprint of the project site, and the lack of any uniquely definable features associated resource features at this proposed project site, impacts would be less than significant.

Mitigation Measure(s):

None required; however, because this project location is on U.S. Forest Service land, consultation with this agency is in progress.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There is no potential for significant fossil remains at this project site.

Mitigation Measure(s):

None required.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within either the direct or indirect areas of potential effects (APEs) and the project location is not sensitive for them. Based on the absence of identified human remains, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: No Impact

Indirect / Visual Impact: No Impact

Discussion:

There are no known Tribal cultural resources as defined by California Assembly Bill 52 within the direct or indirect areas of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014

and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs. Based on the absence of Tribal resources, there would be no impacts from project activities at this project site.

Mitigation Measure(s):

None required.

Geology and Soils

Setting

Surface Geology: Tertiary nonmarine rocks, undivided

Stability: Moderate pending geotechnical analysis

Soil Type: Sobrante-Exchequer-Cieneba Association

Erosion Potential: low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: No

Landslide Zone: No

Steep Slopes: Proposed site is on relatively flat grade surrounded by moderate to steep slopes

Within Area of Known Fissures/Land Subsidence: No

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: No Impact

Operational Impact: No Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, potential liquefaction, or potential land subsidence area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking. Therefore the impacts from potential seismic shaking would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of a well-drained silt loam with low to very high runoff and moderate permeability. Moderate to steep slopes surround the proposed flat building site. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the Los Angeles County planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site to minimize erosion and directed towards existing natural and constructed drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The potential for land spreading, subsidence, and/or collapse is considered to have no Impact on the project. The site is located on a ridge line, with shallow bedrock, on a relatively flat area. Factors that cause these hazards, including dissolution of limestone, mining, and groundwater extraction are not a concern at the site. Earthquake and faulting-related impacts to land spreading, subsidence, and/or collapse may be a concern but are considered "no Impact" since this site is not listed with California Geologic Survey as being within an Alquist-Priolo Earthquake Fault Zone, landslide area, or potential liquefaction area. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for land spreading, subsidence, and/or collapse.

Mitigation Measure(s):

None required.

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site WTR and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site WTR was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site WTR. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site WTR would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site WTR, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site WTR would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Applicable Emergency Response or Emergency Evacuation Plan: Yes

Wildland Fire Risk: No

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: No

If yes, please explain: No

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: No

Flood Inundation Area: No

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within a FEMA-designated 100-year flood zone.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Dams, levees, or other water storage features are not present upgradient of the site, and the site is not located in a flood zone, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations.

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not listed within the official California Inundation Map. No potential exists for inundation by seiche or tsunami. In addition, this site is not situated in an area that is subject to inundation by mudflow.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: Yes

If yes, which agency: USFS

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: No

If yes, please explain: N/A

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Unincorporated Los Angeles County

General Plan Designation: Open Space – National Forest; Forest Plan land use designation is Developed Area Interface

Zoning: Watershed

What is the zoning height restriction, if any?:

Information is not available (either not specified or more specificity in the project application is required to determine if a height restriction exists, which often would be addressed through a conditional use permit).

City or county permit requirements for communication facilities, if any:

Special Use Permit from USFS; county zoning ordinances indicate a Conditional Use Permit is required, although federal land requirements may have primacy and eliminate the need for a county permit. The LA-RICS Authority is not subject to certain local land-use plans, policies, and regulations under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)), and would be exempt from the county permit that normally could be required for a commercial telecommunications application.

Comprehensive Plan or General Plan Local Agency: Los Angeles County

Los Angeles County Community or Area Plan: Santa Clarita Valley Area Plan

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The National Forest Management Act of 1976 (NFMA) established standards for management of national forests and grasslands. NFMA requires projects and permits to be consistent with applicable land management plans (LMPs). The Angeles National Forest LMP provides strategies and tactics for numerous uses and resources including, but not limited to, traditional and contemporary uses, species management, fire, forest health,

watershed, wilderness, heritage resources, recreation, landscape aesthetics, transportation, and rangeland health (USFS, Pacific Southwest Region 2005b).

The Angeles National Forest Plan land designation for the proposed site is identified as in the Developed Area Interface. The Developed Area Interface zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The level of human use and infrastructure is typically higher than in other zones, and the level of development varies between areas that are highly developed to areas where no development has occurred. Although this zone may have a broad range of higher intensity uses, the management intent is to limit development to a slow increase of carefully designed facilities to help direct use into the most suitable areas and concentrating on improving facilities before developing new ones (USFS, Pacific Southwest Region 2005b).

The Forest Service requires a Special Use Permit application prior to the development of facilities on National Forest land. This site is a designated communications site in the Forest Plan, increasing the likelihood of Forest Service approval for the proposed communication facilities. No land use impacts are anticipated because of the communications site designation, but new development will still require a permitting process prior to construction.

Prior to construction, the Authority would apply for a Special Use Permit for each site. If the USFS issues the permit, the Authority would adhere to specified development and operational conditions identified in the permit. The issuance of a permit and adherence to its terms would demonstrate consistency with USFS land use plans and policies. No physical impact would occur as a result of an inconsistency between the proposed project and an applicable plan.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Unincorporated

Applicable Noise Ordinance: Title 12 Environmental Protection, Chapter 12.08 Noise Control, Part 4 Specific Noise Restrictions

Noise Level Threshold: N/A; no construction from 7 pm to 7 am or at any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: N/A

Ambient Noise Level: N/A

Sensitive Noise Receiver 1: N/A

Sensitive Noise Receiver 2: N/A

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

There are no sensitive receivers near this site. In addition, there is no noise level threshold established in the noise ordinance. Construction and operation of this site would not generate noise levels in excess of standards established in the noise ordinance.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a

jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. There are no sensitive receivers near this site; therefore, no groundborne vibrational noise impact would occur.

The ordinance for unincorporated Los Angeles County requires that construction vibration not exceed a perceivable motion velocity of 0.01 PPV over the range of 1 to 100 Hertz at the receiver sites. Although levels in excess of 0.01 PPV are still well below the potential damage 0.12 - 0.50 PPV criteria set by the FTA, the ordinance prohibits construction activities in excess of this threshold. Analysis indicates that vibration levels from construction equipment used for this Project would range from 0.003 PPV for a jackhammer to 0.089 PPV for a loaded 3-ton flatbed at 25 feet. Applying the damage assessment methodology developed by FTA and described in Appendix B 3, the distance beyond which potential vibration from construction of the proposed Project sites would diminish below the 0.01 PPV vibration threshold is 97 feet. There are no sensitive receivers or extremely sensitive (fragile) buildings within this distance or near the Project site; therefore, no impacts due to groundborne vibration from construction would occur.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. There are no extremely sensitive (fragile) buildings and no sensitive receivers near this site; therefore, no impacts due to excessive groundborne vibration or groundborne noise from Project operation would occur.

Mitigation Measure(s):

None required.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, noise levels estimated at 25 feet from proposed sites would not exceed the 90 Dba daytime criterion but would exceed FTA threshold 80 Dba nighttime criterion. Although nighttime construction noise levels would exceed the FTA adverse community guidelines, there are no sensitive receiver locations near this site; therefore, impacts from construction noise would not occur.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by

solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet or more from all project sites and in areas with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds. There are no sensitive receiver locations near this site; therefore, impacts from operational noise would not occur.

Mitigation Measure(s):

None required.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: No

If yes, Plan or Designation Area: N/A

Angeles National Forest: Yes

If yes, Plan or Designation Area: Angeles Forest Plan, Developed Area Interface land use designation

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: No

Other Recreational Area Names: N/A

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The project would not increase use of recreational facilities. Public lands administered by the Forest Service are managed for multiple uses, including recreation. The site is already being used for communication purposes and is not on land specifically designated for recreation, such as a campground or trailhead. Whitaker Ridge is identified as a designated communications site in the Angeles National Forest Land Use Plan. The communication site would preclude recreational use within the fenced area; however, most recreational activities (such as hiking or horseback riding) near the LMR site would be compatible uses of the adjacent lands. Noise and human presence during construction could temporarily impact some types of recreational activities, such as bird watching or camping. Following completion of construction activities, these types of effects would be negligible because facilities would not be manned and maintenance activities would be infrequent. There is existing access to the site, and the proposed action to further develop the site would not change access to recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Golden State Frwy

Distance (Miles):

Disaster Route: Interstate 5

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Golden State Frwy

Distance (Miles): 0.63

Nearest Major Arterial: Sloan Canyon Rd

Distance (Miles): 8.23

Access to the Project Site Provided Via: Whitaker Ridge Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In more remote areas, such as this site location, construction-related traffic could account for from 1 to 9 percent of the total average daily traffic, but the overall traffic volumes are quite low because of the remoteness of the locations and the lack of development; therefore, the increase in traffic for six weeks would not be a disruption to traffic flow.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day and construction activity generally would affect access only to the site (e.g., the existing telecommunications site or water tank site) and would not affect any adjacent roads that could be used for emergency access. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

None required.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Chiquita Canyon Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: N/A

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

Project Description

Site ID: ZHQ

Site Name: Zuma Lifeguard

Site Discussion:

Propose installation of up to 10 whip and up to 3 microwave antennas on new monopole up to 28 feet tall, with additional up to 7 foot lightning rod. Tower obstruction lighting (if required) may include red or white LED lamps, steady and/or flashing. Proposed indoor equipment racks to be located in existing equipment shelter or construct new up to 600 square foot shelter (prefab or CMU) with exterior security lighting. Propose installation of an up to 85kW diesel generator with an up to 1,500 gallon belly tank. Propose installation of up to 800 feet of chain-link fence up to 12 feet high.

Temporary disturbance area (includes staging): Up to 5,000 square feet

Permanent disturbance area: Up to 3,000 square feet

Excavation: Up to 150 cubic yards removed

Proposed trenching for underground conduits to accommodate power, grounding rings and/or fiber not to exceed 800 linear feet length, up to 48 inches below grade, up to 24 inches wide.

Proposed foundations include:

Up to 8 foot diameter x 36 foot deep drilled caisson with concrete cap for monopole support; or up to 16 foot x 16 foot x 10 foot deep concrete mat foundation.

Up to 600 square feet x 18 inch concrete slab, or raised foundation for equipment shelter.

Up to 200 square feet x 18 inch concrete slab for generator.

Demolition of existing pavement and/or structures

Address: 30050 Pacific Coast Highway

City: Malibu

State: CA

Zip: 90265

Latitude: 34.0183770749

Longitude: -118.826283105

Jurisdiction:

Landowner: Los Angeles County

Proposed LMR Facilities

Antenna Support Structure: New Monopole

New Support Structure Height: up to 28'

If Existing Structure is being used, is it FCC Registered?: N/A

FCC Registration Number: N/A

Existing Site Conditions

Existing Onsite Communication Facility Lattice Tower, Monopole, or Antenna: No

Existing Tower Type: N/A

Existing Tower Height: N/A

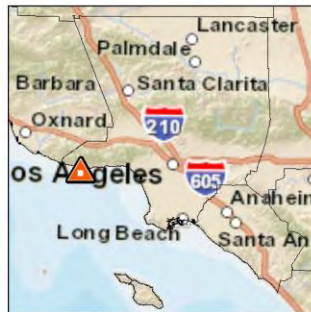
Existing Site Use: County Lifeguard Facility

Existing Ground Elevation (feet AMSL): 12

ZHQ Site Boundary Map



- 200 100 0 Feet
- Los Angeles Assessor Parcels
Published May 2014
- LMR Site Boundary



ZHQ

Zuma Life Guard HQ
 30050 Pacific Coast Hwy.
 Malibu, CA 90265

Proposed New Site Coordinates (NAD83):
 Latitude: 34.018418
 Longitude: -118.826213
 Elevation (Feet): 14

Project Site Photos

The photos below represent the conditions at the LMR site and surrounding area. When available, four directional views are provided that look toward and away from the site. In some instances, access or intervening structures or topography prohibit a representative view from one or more directions..



Site view looking north



Surrounding area north of site



Site view looking south



Surrounding area south of site



Site view looking east



Surrounding area east of site



Site view looking west



Surrounding area west of site

Aesthetics

Setting

Visual Description:

Zuma Beach Lifeguard Headquarters is located in the coastal zone on the west side of 4-lane Pacific Coast Highway (PCH) on Zuma County Beach. The PCH is a major north-south state highway that travels most of the Pacific coastline in California. The PCH is a designated "All-American Road" and is among the nation's most scenic. Ocean views to the southwest across the beach are largely uninterrupted, with the exception of occasional low-rise buildings such as the Life Guard Headquarters, associated parking lots, and telephone poles that line both sides of highway. The Life Guard Headquarters is a beige two-story building with a red Mediterranean style roof. Some slender monopoles with whip antennas are attached to the east side of the building. Automobiles and buses park along segments of this side of the highway. Vegetation on the southwest side of highway is limited to manicured grass and shrubs, and scattered palm trees. Views to the northeast are comprised of a low cliff that rises adjacent to the highway where chaparral vegetation prevails. Scattered development exists on this side of highway. Views to the northwest are of the highway corridor, the ocean, and distant views of the Santa Monica Mountains. Views to the southeast are of the highway corridor, the ocean, limited development, and Point Dume in the distance. California's Coastal Act states that "The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas . . . Shall be subordinate to the character of its setting."

Visual Sensitivity: High

On federally administered public lands: No, but within boundary of Santa Monica Mountains NRA

If yes, enter applicable ratings: N/A

Within the California coastal zone boundary: Yes, City of Malibu Local Coastal Plan

Adjacent to designated scenic highway or regional trail system: Yes

If yes, enter name of scenic corridor: Pacific Coast Highway

State, regional, or municipal recreation area: No

If yes, enter recreation area name: N/A

Historic district or landmark: No

If yes, enter name: N/A

Significant Ridgeline: No

Impact Analysis

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The proposed new features would be uncharacteristic of the scenic vista if no structures were already present. However, the new monopole would be compatible with the existing monopoles that already create a visual intrusion onto the landscape. The new facilities would not perceptibly change the scenic vista due to the presence of the existing monopoles, which would attenuate the noticeability of new one. The new antennas would also not be of sufficient size to have a substantial adverse effect on a scenic vista, including views from the Pacific Coast Highway. In addition, locating the new monopole and equipment with existing structures would concentrate the

impacts so that a small area of the scenic vista is altered, thereby minimizing impacts to it. The low level of impact would help protect views to and along the ocean and scenic coastal areas as called for within the coastal zone. Ongoing and recurring maintenance activities would be barely visible and infrequent. For these reasons, no substantial impacts to scenic vistas would occur. Construction impacts would be related to construction of the new tower and equipment, and creation of a staging area. Construction and demolition activities, and transportation to and from the site would create dust that would temporarily affect the viewshed. These construction activities would result in minor temporary visual impacts.

Mitigation Measure(s):

None required.

AES-2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Proposed new facilities would be located within an existing site that has been previously disturbed. No trees, rock outcroppings, historic buildings or other scenic resources exist at the site, therefore no substantial impact would occur to these resources.

Mitigation Measure(s):

None required.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The existing visual character and quality of the site and its surroundings are impacted by the presence of existing monopoles. The new monopole and associated equipment would be compatible with the existing site, and with the surrounding, predominantly built environment. The same construction activities described for scenic vistas, described above, would also apply, with temporary degradation of the existing visual character due to the presence of machinery and construction activity.

Mitigation Measure(s):

None required.

AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Temporary impacts related to glare from the windshields of construction vehicles or headlights (if used during daylight hours) would occur. Construction would not occur at night; therefore, no night lighting of sites or nighttime headlight glare from construction vehicles would occur. This site would be located in an urban area and would include construction of new facilities. The proposed Project facilities would be constructed of materials that do not produce glare. Exterior security lighting equivalent to a 100-watt light bulb would be required if a new equipment shelter is constructed. For aviation safety, FAA may require lighting on the new towers consisting of steady and/or flashing red or white light-emitting diodes (LED) lamps. This site is in an urban area where numerous sources of day and nighttime lighting are present, such as vehicle headlights, traffic signals, street lights, and building security lights. Because of the presence of these light sources, tower lighting, if required, would not

introduce a substantial new source of light or glare that would adversely affect day or nighttime views in the area.

Mitigation Measure(s):

None required.

Air Quality

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

Federal Nonattainment/Maintenance Status: Nonattainment: O3, PM2.5; Maintenance: CO, NO

State Nonattainment Status: O3, PM2.5, PM10

Applicable Air Quality Management Plan(s):

SSCAQMD Final 2012 Air Quality Management Plan, Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities

Significance Thresholds:

General (tons/year): VOC, NOx (10), CO (100), PM2.5 (100), PM10 (70); Local construction (lbs./day): NOx (100), VOC (75), PM2.5 (55), PM10 (150), CO (550); Local operation (lbs./day): NOx (55), VOC (55), PM2.5 (55), PM10 (150), CO (550)

Nearest Sensitive Receptors: Kiosk

Distance to Sensitive Receptor: 20

Impact Analysis

AQ-1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant

Discussion:

The SCAQMD air quality plan considered in this analysis is the SCAQMD 2012 Air Quality Management Plan (SCAQMD Plan). The purpose of this plan is to demonstrate attainment of the PM2.5 24-hour standard of 35 µg/m³ by 2014 within the SCAB, identify measures and actions to fulfill the 8-hour O3 SIP commitments to the USEPA to achieve emissions reductions from Best Available Control Technology (BACT), and to demonstrate attainment of the 1-hour O3 CAAQS by 2022.

A maximum construction activity scenario as described in Appendix B-1 was assumed for proposed site ZHQ. The analysis indicates that emissions from construction of this site would not exceed SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all proposed Project sites would exceed this threshold and could conflict with or obstruct implementation of the SCAQMD Plan resulting in a significant impact. The analysis also indicates that NOx emissions from simultaneous construction of all proposed Project sites located in the SCAB would exceed the daily significance threshold even if Tier 4 equipment is being used. Tier 4 standards for nonroad compression-ignition engines used in construction and built in 2014 or later are subject to emissions requirements established in 40 CFR 1039.101 that reduce emissions by up to 90 percent.

The maximum number of proposed Project sites that can be constructed simultaneously while staying beneath the SCAQMD threshold for this criteria pollutant was examined. The analysis indicates that a maximum of 13 sites can begin construction on the first day of the anticipated six week schedule for each site. By staggering the schedules for individual sites, construction of additional sites can begin with up to 28 sites under construction simultaneously without exceeding daily NOX emissions limits for the unmitigated scenario. A maximum of 16 sites can begin construction on the first day of a six-week schedule for each site if Tier 4 equipment is utilized. By staggering the schedules for individual sites and using Tier 4 equipment, construction of additional sites can begin with up to 37 sites under construction simultaneously without exceeding daily NOX emissions limits. With implementation of Mitigation Measure AQ MM 1, the construction of proposed Project sites would not conflict or

obstruct implementation of the SCAQMD Plan; therefore, the Project impacts would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Emissions from the operation of proposed site ZHQ or the simultaneous operation of all proposed Project sites located in the SCAB including would not conflict or obstruct implementation of the SCAQMD Plan; therefore, the Project operational impacts would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-2: Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Construction Impact: Less than Significant

Operational Impact: Less than Significant

Discussion:

Emissions from the construction of proposed site ZHQ would not exceed the SCAQMD daily significance thresholds including NOx, a precursor for O3; however, simultaneous construction of all 51 proposed Project sites located in the SCAB would result in violation of this threshold, and could contribute to the SCAB nonattainment status for O3. The Project's construction emissions in the SCAB would be significant. With implementation of Mitigation Measure AQ MM-1, which requires the contractor to submit to the Authority for review and approval the week prior to construction a report that verifies the estimated emissions of NOx from all construction activities at all proposed Project sites will not exceed the SCAQMD 100 pound daily threshold or which proposes substitution of equipment with Tier 4 engines or limitation of construction activities to comply with this threshold, the Project construction impacts in the SCAB would not violate any air standard or contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Operational emissions would result from trips to the proposed Project sites for maintenance and testing of emergency generators. Operational emissions from the proposed Project sites in the SCAB including site ZHQ will not exceed significance thresholds for any criteria pollutants, would not contribute substantially to an existing or projected air quality violation and therefore, would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the

contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-3: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

This analysis focuses on the criteria pollutants for which the region is classified as nonattainment: O3, PM2.5 (NAAQS and CAAQS), and PM10 (CAAQS) in the SCAB. Cumulatively considerable net increases in these pollutants were determined relative to the SCAQMD significance thresholds for each.

Emissions from the construction of proposed site ZHQ would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx; however, simultaneous construction of all 51 proposed Project sites within the SCAB would exceed the significance threshold for NOx and could result in cumulatively considerable net increases in O3 from the NOx emissions.

With implementation of Mitigation Measure AQ MM 1, construction emissions of O3 precursor NOx would not result in a cumulatively considerable net increase in O3 in the SCAB; therefore, NOx emissions in the SCAB would be less than significant. Compliance with SCAQMD significance thresholds is sufficient to demonstrate that the construction of the Project would not result in a cumulatively considerable net increase in these criteria pollutants; therefore, the impact of Project construction would be less than significant.

Operational emissions of proposed site ZHQ or the simultaneous operation of all proposed Project sites in the SCAB would not exceed SCAQMD significance thresholds for PM2.5, PM10 or O3 precursor NOx and would not result in cumulatively considerable net increases in O3; therefore, the impact of Project operation would be less than significant.

Mitigation Measure(s):

AQ MM 1

No later than 12:00 pm on the Thursday prior to each week of construction, the contractor shall submit a report to the Authority for review and approval which includes, at minimum, the following information: (1) a list of the types and numbers of pieces of on-site construction equipment that will operate at each proposed Project site within the SCAB on each day of the following week of construction; (2) an estimate of the combined total of NOX emissions from all construction activities at all proposed Project sites in the SCAB for each day of the week and verification that the total does not exceed 100 pounds; (3) If combined NOX emissions are forecast to exceed 100 pounds on any day during the week following submittal of the report, the report shall document this fact, and the contractor shall substitute equipment with Tier 4 engines that adhere to emissions standards listed in 40 CFR 1039.101 for all types of off-road equipment to which Environmental Protection Agency regulations apply to the extent necessary to reduce emissions to 100 pounds, or otherwise limit construction activity to the extent necessary to reduce daily basin-wide NOX emissions to 100 pounds, to the satisfaction of the Authority. Compliance with this requirement shall be documented in the following week's report.

AQ-4: Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The SCAQMD has established local significance thresholds (LSTs), which were developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and the distance of the pollutant source to the nearest sensitive receptor. There are 39 designated SRAs in the SCAQMD. The LSTs are modifications to the thresholds for NOx, CO, PM10, and PM2.5. The district has not established local thresholds for reactive organic gases (ROGs). Table 9 in Appendix B-1 lists the SRAs within which each of the proposed Project sites would be located including site ZHQ, the distance of each proposed site to the nearest sensitive receptor, and the resulting LST for these criteria pollutants.

For site ZHQ, which is 41 feet from the nearest receptors, the LSTs for criteria pollutants in SRA No. 2 are higher than the SCAQMD thresholds. Per SCAQMD guidance (SCAQMD, 1993), compliance with the local significance thresholds for criteria pollutants demonstrates that construction and operation of the proposed Project sites in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors for this and all project sites would be less than significant.

As discussed in Chapter 3.2.4, the duration of Project construction and operation emissions of diesel particulates, a toxic air contaminant, would be less than the two month minimum for a health risk assessment recommended by the Office of Environmental Health Hazard Assessment at all sites including site ZHQ and were not assessed further.

Demolition of existing structures at proposed sites in the SCAB would be subject to SCAQMD Rule 1403, which is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with District Rule 1403 and minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality.

Proposed sites within the SCAB would lie outside areas within California that are more likely to contain NOA according to a study completed by the California Department of Conservation, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos (DOC, 2000); therefore, NOAs are not discussed further in this assessment.

Per SCAQMD guidance, compliance with the district's health based risk assessment significance thresholds is sufficient to demonstrate that construction and operation of the proposed Project sites including site ZHQ in the SCAB would not result in exposure of sensitive receptors to substantial pollutant concentrations; therefore, impacts to sensitive receptors would be less than significant.

Mitigation Measure(s):

None required.

AQ-5: Would the project create objectionable odors affecting a substantial number of people?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Project construction emissions of dust from demolition activities, and/or excavated soil has the potential to generate objectionable odors. However, odors most often reported to the SCAQMD are associated with transfer station/recycling, autobody, foundry/metal processing, wastewater/water treatment, and landfills, which comprise approximately 55-percent of all complaints. Construction activities that include painting and solvent use accounting for only 3-percent of complaints. The construction of site ZHQ and all proposed Projects sites would not include extensive soil excavation or other construction activities (painting and solvent use) that commonly trigger public complaints and would not likely create an odor nuisance pursuant to SCAQMD Rule 402. In addition, the operation of proposed Project sites include scheduled monthly maintenance visits to test backup generators and concurrent biannual trips for routine maintenance activities and would not create an odor nuisance pursuant

to SCAQMD Rule 402; therefore, Project impacts of the proposed Project would be less than significant.

Mitigation Measure(s):

None required.

Biology

Setting

Special Status Animals Recorded within 1 Mile:

groundfish (M&F-EFH); monarch butterfly (Danaus plexippus; ESA-Pet)

Special Status Plants Recorded within 1 Mile:

None

Sensitive Communities Recorded within 1 Mile:

western snowy plover critical habitat(Charadrius alexandrinus nivosus; ESA-T, ESA-CH, CDFW-SSC); tidewater goby critical habitat (Eucyclogobius newberryi; ESA-E, ESA-CH, CDFW-SSC);

Species or Habitat Present in Project Vicinity (Generally Within 500 Feet):

western snowy plover (Charadrius alexandrinus nivosus; ESA-T; CDFW-SSC)

Designated Critical Habitat Within 500 Feet:

western snowy plover (Charadrius alexandrinus nivosus; ESA-T; CDFW-SSC); groundfish (M&F-EFH)

Riparian Habitat Within 500 Feet:

None

Indicators of Waters of the US Within 500 Feet:

Yes

Wildlife Corridor or Nursery Site:

Los Angeles County Zuma County Beach; CRA - Malibu Coastline; SCAG Zoning - Open Space and Recreation

Local Policy or Ordinance for Biological Resources:

City of Malibu Local Coastal Program

Applicable HCP or NCCP:

None

Dominant Vegetation Community:

Ornamentals

Impact Analysis

BIO-1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site ZHQ is located at the Zuma Beach lifeguard station with a paved parking lot between the Pacific Coast Highway and the beach, heavily used by recreationists. All natural sand dunes have been bladed flat. Some native coastal strand species are present adjacent to existing structures. Native species observed included (Cakile maritima), California croton (Croton californica), heliotropium, and pickleweed iceplant (Carpobrotus edulis). Monarch butterflies (Danaus plexippus; ESA-Pet) may pass through the area but there are no potential roost trees. Western snowy plover (Charadrius alexandrinus nivosus; ESA-T, ESA-CH, CDFW-SSC) critical habitat has been designated along the beach adjacent to the project site. The beach is a focal area for recreationists, whose presence would preclude nesting by the plover on the beach; nesting occurs in protected areas. Tidewater goby (Eucyclogobius newberryi; ESA-E, ESA-CH, CDFW-SSC) designated critical habitat is approximately 0.35 miles southeast of the site at the intermittent outflow from Zuma Canyon. Essential fish habitat has been designated for groundfish (a guild of bottom dwelling marine fishes) along the coastline within the project area; no project activities would impact

marine environments. Disturbance to or destruction of nests of native bird species that are protected by the Migratory Bird Treaty Act and the California Fish and Game Code Section 3503.5 and 3513 could occur as a result of vegetation removal or other on-site construction activities.

Mitigation Measure(s):

A biological monitor will verify no breeding western snowy plover (*Charadrius alexandrinus nivosus*; ESA-T, ESA-CH, CDFW-SSC) are utilizing the project area through coordination with USFWS and on-site surveys. Anti-perch devices will be affixed to elevated surfaces to preclude perching by avian predators of the plover. Preconstruction surveys for nesting birds will occur prior to on-site construction-related disturbance activities from March 1 through September 15. Appropriate buffers, based in part on the species present and site-specific conditions, will be established to protect nesting birds and active bird nests. Required mitigation measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 WEAP • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring • BIO MM 10 No Pets • BIO MM 16 Snowy Plover Protection • BIO MM 18 Nesting Bird Protection

BIO-2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Critical habitat for the Western snowy plover is within the study area. There are no riparian habitats within 500 feet of the project site. Essential fish habitat has been designated (for groundfish, coastal pelagic species, U.S. West Coast fisheries for highly migratory species) along the coastline; no project activities would impact marine environments.

Mitigation Measure(s):

Required Mitigation Measures: • BIO MM 1 Mitigation Monitoring and Reporting Plan • BIO MM 2 Worker Environmental Awareness Program • BIO MM 3 Biological Compliance Reporting • BIO MM 6 Anti-perch Devices • BIO MM 8 Biological Monitoring

BIO-3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

The project area includes the following two wetland feature types as indicated by the National Wetland Inventory (USFWS 2014): 1) Freshwater Forested/Shrub Wetland; and 2) Estuarine and Marine Wetland. However, these wetland types are restricted to ephemeral drainages. Adverse impacts to these wetlands may occur due to sedimentation as a result of runoff from the construction. However, construction activities would be limited to the project site which is isolated from these drainages by the Pacific Coast Highway; best management practices would be implemented to control erosion and sedimentation of excavated soil from stormwater runoff.

Mitigation Measure(s):

None required.

BIO-4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Zuma Beach is adjacent to the Pt Dume State Marine Conservation Area, The Santa Monica Mountains National Recreation Area and Malibu Creek State Park. The main goal of the state park is to preserve the riparian forest and woodlands and its wildlife habitat and the stream. The proposed project would be located within a previously disturbed area and proposed activities are consistent with current site usage. The proposed project would not introduce new disturbances to wildlife corridors that would interfere substantially with wildlife movement.

Mitigation Measure(s):

None required.

BIO-5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Site ZHQ does not contain Environmentally Sensitive Habitat Areas (ESHAs), but the study area includes both beach areas and the Pacific Ocean which are ESHA under the City of Malibu Local Coastal Program (LCP) Land Use Plan (LUP). The City of Malibu General Plan Conservation Element provides specific conservation policies. These include avoidance of consumption of ecologically sensitive lands (including ESHAs [CON Policies 1.1.1 and 1.2.4]), prioritization of protection of ESHA over development (CON Policy 1.1.4), protection of plants and wildlife (CON Policy 1.1.5), prevention of spread of invasive plants (CON Policy 1.2.5), discouragement of use of herbicides (CON Policy 1.2.7), protection of all sea birds/shore birds and their nesting and roosting sites in ESHA, and control of surface runoff (CON Policy 1.3.11). Impacts from construction and operations are described in BIO Impact 1, Bio Impact 2, and Bio Impact 3. Because a potential for significant impact associated with the resources protected by the LCP LUP exists, a conflict with the policies contained in the LCP LUP exists and this would constitute a significant impact.

Mitigation Measure(s):

The mitigation measures identified in Impact BIO 1 coupled with application of LU MM 3 (requiring the Authority obtain a coastal development permit) would reduce impacts to less than significant. Required mitigation measures:

- BIO MM 1 Mitigation Monitoring and Reporting Plan
- BIO MM 2 Worker Environmental Awareness Program
- BIO MM 3 Biological Compliance Reporting
- BIO MM 4 Site Sanitation
- BIO MM 5 Hazardous Materials Management
- BIO MM 8 Biological Monitoring
- BIO MM 9 Protect Native Vegetation and Common Wildlife
- BIO MM 10 No Pets
- BIO MM 11 Site Access
- BIO MM 16 Snowy Plover Instructions
- BIO MM 18 Nesting Bird Instructions
- BIO MM 24 Prevent the Spread of Nonnative Vegetation

BIO-6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No applicable Habitat Conservation Plan or Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan occurs. No impacts from construction or operations would occur.

Mitigation Measure(s):

None required.

Cultural Resources

Setting

Area of Potential Effects (APE) on Federal Land: No

Historical Resources / Historic Properties within the Construction Footprint (Direct APE):

Archaeological: No

Architectural: No

Native American: No

Historical Resources / Historic Properties within the ½ mile Visual (Indirect) APE:

Archaeological: Yes

Architectural: No

Native American: Yes

Unique Paleontological/Geological Resources: Yes

Sensitive for Human Remains within the Direct / Indirect APE:

Yes

Proximity to a National Historic Landmark (Within the Direct APE or Within the Visual (Indirect) APE):

No

Proximity to a Confirmed (listed or officially determined eligible) Historic District (Within the Direct APE or Within the Visual (Indirect) APE):

No

Impact Analysis

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no previously recorded historical resources within the direct area of potential effects (APE). The direct APE encompasses the Zuma Beach Lifeguard Headquarters building (built ca 1955), a garage, and a storage building surrounded by a large paved parking area. Based on archival research and a site visit in January 2015, the lifeguard station is not a historical resource. Within the indirect APE, the Pacific Coast Highway runs east/west and immediately adjacent along the northeastern boundary of the project area. The Pacific Ocean is within 250 feet to the southwest and more than half of the indirect APE encompasses the Pacific Ocean. There are five recorded prehistoric archaeological/Native American resources (Resource Nos. P-19-002829, P-19-002814, P-19-002813, P-19-000200, and P-19-000201); one of these is recorded as having burials. All five of the sites have been described as disturbed from grading and modern development, including the alignment of the Pacific Coast Highway,, which bisets at least one and likely three of the recorded resources. None of the five archaeological sites are designated as historical resources; however, both north and south of the Pacific Coast Highway sensitive for prehistoric archaeology and burials. Based on indigenous use of marine resources subsurface archaeological materials could extend as far as the coastline. LMR activities at this project location include attachment of whip and microwave antennas on a proposed 28-foot monopole, construction of a new equipment shelter, and installation of a new backup generator and fuel tank on a concrete pad. The status and conditions at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the archaeological sensitivity of the

Project site, impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be reduced to less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors are required during all ground disturbing activities at this project location to ensure that archaeological resources are protected.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

There are no previously recorded historical resources within the direct area of potential effects (APE). The direct APE encompasses the Zuma Beach Lifeguard Headquarters building (built ca 1955), a garage, and a storage building surrounded by a large paved parking area. Based on archival research and a site visit in January 2015, the lifeguard station is not a historical resource. Within the indirect APE, the Pacific Coast Highway runs east/west and immediately adjacent along the northeastern boundary of the project area. The Pacific Ocean is within 250 feet to the southwest and more than half of the indirect APE encompasses the Pacific Ocean. There are five recorded prehistoric archaeological/Native American resources (Resource Nos. P-19-002829, P-19-002814, P-19-002813, P-19-000200, and P-19-000201); one of these is recorded as having burials. All five of the sites have been described as disturbed from grading and modern development, including the alignment of the Pacific Coast Highway,, which bisets at least one and likely three of the recorded resources. None of the five archaeological sites are designated as historical resources; however, both north and south of the Pacific Coast Highway sensitive for prehistoric archaeology and burials. Based on indigenous use of marine resources subsurface archaeological materials could extend as far as the coastline. LMR activities at this project location include attachment of whip and microwave antennas on a proposed 28-foot monopole, construction of a new equipment shelter, and installation of a new backup generator and fuel tank on a concrete pad. The status and conditions at this project location were confirmed through archival research and during a field survey conducted by both a Secretary of the Interior (SOI)-qualified archaeologist and architectural historian in January 2015. Based on the archaeological sensitivity of the Project site, impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be reduced to less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors are required during all ground disturbing activities at this project location to ensure that archaeological resources are protected.

CUL-3: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Proposed project activities would have a significant impact on paleontological resources. The site is mapped as low sensitivity younger Quaternary alluvial sediments at the surface. However, these deposits typically overlie older geologic units that may contain significant vertebrate fossils at depth. No localities are recorded within the proposed site; however a locality is recorded in the vicinity that produced an extensive fossil fauna of late Pleistocene vertebrates. Recovered fossils include tapir, deer, horse, rabbit, rodent, and numerous bird species. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 6 and 7 would be implemented at this project site. Periodic paleontological spot checks are required when excavation exceeds depths of five feet into the Quaternary alluvium to determine if older, paleontologically

sensitive sediments are present. If present, monitoring would be conducted during excavation into paleontologically sensitive sediments to reduce the impact to a less than significant level. In accordance with CUL MM 6, prior to the start of construction a paleontological resources monitoring plan would be prepared and implemented. The plan would include specific locations and construction activities requiring monitoring, procedures to follow for monitoring and fossil discovery, and a curation agreement with the Natural History Museum of Los Angeles County.

CUL-4: Would the project disturb any human remains, including those interred outside of formal cemeteries?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

No human remains have been identified within the direct area of potential effects (APEs); however, based records searches, field survey and the presence of nearby recorded archaeological sites, the project site has moderate to high sensitivity for them. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors are required during all ground disturbing activities at this project location to ensure that human remains are protected.

CUL-5: Would the project directly or indirectly disturb Tribal cultural resources?

Direct Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Indirect / Visual Impact: No Impact

Discussion:

Tribal cultural resources as defined by California Assembly Bill 52 have been identified within the indirect area of potential effects (APEs). The Native American Heritage Commission (NAHC) was contacted in August 2014 and a search of their sacred land file requested. A response from the NAHC in September 2014, indicated there were no known Native American cultural resources present within either the direct or indirect APEs; however current records searches and field surveys reveal the presence of archaeological/Tribal resources on both the north and south sides of the Pacific Coast Highway making the project site sensitive for them. Impacts at this Project site would be significant; however, with implementation of mitigation measures, impacts would be less than significant.

Mitigation Measure(s):

CUL MM 1, 3, and 4 would be implemented at this project site. Archaeological monitors are required during all ground disturbing activities at this project location to ensure that Tribal resources are protected.

Geology and Soils

Setting

Surface Geology: Miocene marine rocks

Stability: Moderate pending geotechnical analysis

Soil Type: Urban land-Rock outcrop-Millsholm Association

Erosion Potential: Low

Expansive Soil: No

Alquist-Priolo Zone: No

Liquefaction Potential: Yes

Landslide Zone: No

Steep Slopes: No

Within Area of Known Fissures/Land Subsidence: An Earthquake Fault Line has been identified approximately 2 miles northeast of the property (EDR, 2014). However, property is not located within an Alquist-Priolo Earthquake Fault Zone.

Impact Analysis

GEO-1: Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Construction Impact: No Impact

Operational Impact: No Impact

ii) Strong seismic ground shaking?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iii) Seismic-related ground failure, including liquefaction?

Construction Impact: Significant Impact Reduced to Less than Significant w

Operational Impact: Less than Significant Impact

iv) Landslides?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles County Department of Public Works (LADPW) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo

Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking including liquefaction. GMED may require special foundation requirements, such as spread footings, deep piles, or other modifications to the foundation to reduce potential effects of liquefaction. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-2: Would the project result in substantial soil erosion or the loss of topsoil?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Available soil data suggests the proposed site is comprised of fine-grained sand and light clay loam material. This soil type exhibits a well-drained, medium to very rapid runoff with moderate permeability. Building permits require that standard BMPs for erosion control be put in place on all projects. Construction plans would be reviewed by the City of Malibu planning department prior to issuance of a building permit to ensure proper drainage is maintained at the site and directed towards existing natural drainage features.

Mitigation Measure(s):

None required.

GEO-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Construction Impact: Significant Impact Reduced to Less than Significant with Miti

Operational Impact: Less than Significant Impact

Discussion:

This site does not fall within a designated Alquist-Priolo (A-P) Earthquake Special study zone, potential landslide zone, or potential land subsidence area. The site does lie within a potential liquefaction area as designated by California Department of Conservation, California Geological Survey (CGS). A geotechnical geology and soils report for the site is required to obtain a building permit for the construction of new antenna support structures. The report is reviewed by Los Angeles Department of Public Works (LADWP) Geotechnical and Materials Engineering Division (GMED). GMED is responsible for conducting the review of geologic and soils reports for verification of compliance with the Los Angeles County Building Code, State Seismic Mapping Act and Alquist-Priolo Earthquake Fault Zone Act. These acts and California Building Codes ensure site design includes specific elements to minimize damage from seismic shaking including liquefaction. GMED may require special foundation requirements, such as spread footings, deep piles, or other modifications to the foundation to reduce potential effects of liquefaction. Therefore the impacts from potential seismic shaking, landslides, or liquefaction would be Less than Significant with Mitigation for this site.

Mitigation Measure(s):

GEO MM 1, Geotechnical Investigation

GEO-4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated changes in the moisture content. This site does not exhibit these soil characteristics and this hazard

has no impact for construction and operation at the site. Construction design would be based off of geotechnical analysis of the soils at the site and would further consider the potential for expansive soils. Compliance with building codes and requirements would reduce expansive soil-related hazards.

Mitigation Measure(s):

None required.

Greenhouse Gases

Setting

Air Basin: South Coast

Air Quality Management District: South Coast

AQMD Significance Threshold: 10,000 metric tons CO₂equivalent(eq)/year (MTCO₂e)amortized over life of the Project

Applicable Greenhouse Gas Plan, Policy, or Regulation:

EO S-3-05/B-16-2012/B-30-15, AB 32 California Global Warming Solutions Act of 2006, SB 97, SCAQMD Interim CEQA GHG Significance Threshold, Rule 2701 SoCAL Climate Solutions Exchange, Rule 2702 GHG Reduction Program

GHG-1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Direct emissions of GHGs associated with the operation of LMR Site ZHQ and all the proposed Project sites include emissions from vehicles transporting routine maintenance personnel to service equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for the 51 proposed Project sites in the SCAB. The generator test would last one hour at each site and test days would be evenly distributed during each month of the year. For the analysis it was assumed there will be an average of 11.75 trips per week to sites within the SCAB, with three maintenance trips on four weekdays per week and three additional weekday trips per month. It is also assumed that maintenance days coincide with generator test days.

Finally, indirect GHG emissions from electricity consumption to operate equipment (monopole/antennas) at each proposed Project site including LMR Site ZHQ was determined with an assumed power rating from the Los Angeles Department of Water and Power for this analysis, which is included in the CalEEMod emissions model.

Total annual GHG emissions for all 51 Project sites in the SCAB are estimated at 2,214.17 MTCO₂e, or less than 44 MTCO₂e annually for proposed Project site ZHQ. Per guidance provided by the SCAQMD, construction emissions were amortized by averaging daily emissions estimates during the construction period over a 30-year project lifetime for the proposed Project. The estimated annual direct emissions of GHGs from the construction and direct and indirect emissions of GHGs from operation of proposed Project site ZHQ would be substantially below the SCAQMD annual 10,000 MTCO₂e threshold; therefore, the construction and operation of this site would have a less than significant impact on the environment.

Mitigation Measure(s):

None required.

GHG-2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The CARB 2015 Edition of the California GHG Emission Inventory; California Greenhouse Gas Emissions for 2000 to 2013 – Trends of Emissions and Other Indicators summarizes statewide emissions of GHGs from seven source categories in the AB 32 Scoping Plan including transportation, industrial, electric power, commercial and

residential, agriculture, recycling and waste, and high global warming potential, which consist of primarily of substitutes for ozone depleting substances. Trends in GHGs indicate a 1.5 million MTCO₂e decrease from 2012 to 2013 and 7 percent from peak levels in 2004. Emissions from the transportation sector represented 37 percent of total emissions in 2013, with the majority of emissions coming from on-road vehicles. Trends in this sector indicate an 11 percent decrease from 2007 peak levels, primarily due to low-carbon fuel standards and incentives for alternative fuel vehicles such as compressed natural gas. Emissions from the electric power sector represented 20 percent of statewide GHG emissions in 2013, with emissions decreasing by approximately 20 percent from peak levels in 2008. Decreases in the energy sector are a primary result of decreases in imported electricity, more efficient renewable sources including solar and wind power, and the use of increased energy production from combined-cycle power plants. During the period 2000 to 2013, California per capita GHG emissions have continued to drop from a peak 14 MTCO₂e in 2001 to 12 MTCO₂e in 2013.

Estimated GHG emissions from community activities in unincorporated areas of Los Angeles (ULAC) in 2010 were estimated at 7.9 million MTCO₂e. Of these total emissions, building energy use is the largest source of emissions (49%). Transportation emissions from on- and off road vehicles are the second largest source of emissions (42%). The third largest source is community waste generation (7%). The remaining sources are water conveyance and wastewater generation (2%), agriculture (0.4%), and stationary sources (0.02%). Trends for greater Los Angeles County, including unincorporated areas indicated an overall reduction for the period 2005 – 2008 from 8.1 million MTCO₂e to 7.98 million MTCO₂e, a reduction of 1.48%. The ULAC Community Climate Action Plan 2020 projects a 10% reduction from 2013 levels in unincorporated areas of the County will be necessary to be consistent with AB 32 and has set a goal of 11% emissions reductions for the period 2013 – 2020.

Approximately 88.5 percent of the GHG emissions from the proposed Project sites, including site ZHQ, would be associated with the electrical needs for equipment operation; and the remaining 11.5 percent would be for construction and maintenance. Compliance with the SCAQMD significance thresholds for GHGs would not trigger mandatory reporting of site emissions to CARB. Compliance demonstrates that the contribution to statewide and ULAC emissions, which are trending downward for transportation and electric power sources, would be less than significant; therefore, the construction and operation of proposed Project site ZHQ would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Mitigation Measure(s):

None required.

Hazardous Materials

Setting

School(s) Within Quarter Mile: No

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: Los Angeles County Sheriff Heliport

Applicable Emergency Response or Emergency Evacuation Plan: yes

Wildland Fire Risk: Yes

Site Located on Land Listed as a Hazardous Materials Site?: No

If yes, please explain: N/A

Site Located within 1 Mile of National Priority List (Superfund) Site?: No

If yes, please explain: N/A

Site Located Within ¼ Mile of Listed Cortese, Leaking Underground Storage Tank (LUST), Permitted Underground Storage Tank (UST) or Brownfield Site?: No

If yes, please explain: N/A

Site Located in a Methane Hazard Zone?: No

If yes, please explain: N/A

Potential for Methane Exposure?: No

If yes, please explain: N/A

Located within 200 feet of an Oil or Gas Well?: No

If yes, please explain: N/A

Site Located within 1,000 Feet of a Landfill?: No

If yes, please explain: N/A

Located in a Local Fire hazard Zone?: Yes

If yes, please explain: Very High Fire Severity Zone

Located in a State Fire Hazard Zone?: No

If yes, please explain: N/A

Federal Aviation Administration (FAA) Part 77 Notification due to Proximity of Site:

Impact Analysis

HAZ-1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state, and local regulations. Diesel fuel would be the primary hazardous material used at the site. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous material and waste transporters are required to complete and carry hazardous waste manifests with shipments. Accidental spills or releases associated with the on-site fuel storage tanks would be controlled through secondary containment, SPCC plans where applicable, and worker education. Emergency response plans would be in place. Hazards would be

reduced to a less than significant impact through implementation of regulations and requirements addressing transport driver education, preparation of SPCC plans to contain spills or releases on-site, and emergency response plan preparation and coordination.

Mitigation Measure(s):

None required.

HAZ-2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

A diesel fuel tank from 1,000 up to 1,500 gallons would be integrated into the design of the backup generator for the project. The fuel tanks would be installed in accordance with California Fire Code and applicable hazardous material storage ordinances. Federal, state, and local regulations, permits, and notification procedures associated with construction, installation, use, and storage of fuel tanks and fuel would be implemented. Tanks would meet nationally recognized standards. Secondary containment would be in place. Tanks greater than 660 gallon capacity, or fuel storage greater than 1,320 gallons, would have an SPCC Plan prepared in accordance with 40 CFR Part 112.

Mitigation Measure(s):

None required.

HAZ-3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no schools located within 0.25 mile of the proposed Project site.

Mitigation Measure(s):

None required.

HAZ-4: Would a project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located on a hazardous material site pursuant to Government Code Section 65962.5.

Mitigation Measure(s):

None required.

HAZ-5: Would a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the boundaries of an airport land use plan or within two miles of a public airport or public use airport.

Mitigation Measure(s):

None required.

HAZ-6: Would a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

The proposed Project site is not located within the vicinity of a private airstrip.

Mitigation Measure(s):

None required.

HAZ-7: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Construction activities are reviewed, shift changes understood, and ingress and egress for construction equipment reviewed and placed to minimize impact to the facility where the monopole or tower is being constructed. Installation of hardware and integration of software for LMR equipment is planned so as to minimize disruption, if any, of local emergency responders' communications.

Operation of the LMR communication system is designed to enhance communications among emergency responders and facilitate better coordination among various agencies responding. The proposed Project would enhance implementation of emergency plans.

Mitigation Measure(s):

None required.

HAZ-8: Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

The proposed Project site is located within a Very High Fire Hazard Severity Zone. Construction at all sites would comply with applicable regulations, including provisions for emergency vehicle access, use of approved building materials, design, and brush clearance. For sites in very high fire hazard zones, there is an elevated potential for ignition of wildland fire associated with construction, and ignition of a wildland fire would be a significant impact. Operations activities would not be expected to result in wildland fire ignition and impacts would be less than significant.

Mitigation Measure(s):

Implementation of HAZ MM 3, Fire Management Plan, would increase fire awareness, provide for fire communications, provide for available water and fire suppression tools on site, and prohibit smoking in open areas. With implementation of HAZ MM 3 the potential to ignite wildland fire on site would be greatly reduced,

and the impact reduced to less than significant.

Hydrology and Water

Setting

Regional Water Quality Control Board: Los Angeles

Floodzone: Yes, Flood zone AE

Flood Inundation Area: Yes

Groundwater Basin: Unnamed

Impact Analysis

WQ-1 : Would the project violate any water quality standards or waste discharge requirements?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

There is no potential for violation of water quality standards from storm water runoff during construction, as building permit requirements include application of BMPs already incorporated into project design that prevent sediment from exposed soils migrating off site. Deep excavation associated with the support structure foundation may result in groundwater being encountered. In the event groundwater is encountered and dewatering is necessary, a discharge permit would be required from the applicable Regional Water Quality Control Board. Compliance with the permit conditions would prevent any violation of water quality standards and would meet waste discharge requirements. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

MM UTL 1 would be required in the event dewatering from foundation excavation is required.

WQ-2 : Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Groundwater would likely be included in the up to 500 gallons of water obtained from public water supplies necessary to construct the site. Only minor new impervious surfaces would be constructed at the site. Minor amounts of water would be used during operations for domestic purposes. These minor uses would not result in overdraft or prevent recharge of any known aquifer.

Mitigation Measure(s):

None required.

WQ-3 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

All construction plans would be submitted to and reviewed by local and/or county planning departments prior to

issuance of a building permit. Design of all building pads will be required to demonstrate positive drainage towards existing natural and/or storm drain catch areas. All plans would be reviewed during the permitting process and prior to start of construction to ensure existing storm drain system can support additional runoff. If runoff is directed towards a natural drainage, design may be required to include a baffle system to preclude any adverse erosion to existing natural drainage feature. BMPs as described in the text will be implemented during construction to limit erosion of exposed soils (e.g. during excavation). Therefore, construction and operation would not substantially alter the existing drainage of the area in a manner to result in substantial erosion or siltation off site.

Mitigation Measure(s):

None required.

WQ-4 : Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Proposed construction would not substantially alter the existing drainage of the area. BMPs applied during construction, as required during the permitting process would include a requirement for positive drainage toward existing and natural storm drain catch areas. Once construction is completed, any exposed soils would be stabilized, and operation of the facility would not result in discharge of measurable amounts of runoff from the proposed facility.

Mitigation Measure(s):

None required.

WQ-5 : Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Stormwater discharge requirements during construction and operation of this site will be managed in accordance with the Federal, State, and Local/Municipal regulations and building codes. In addition, the proposed impervious footprint would result in limited change in runoff volume already existing at the site. BMPs will be employed to limit Total Suspended Solids from leaving the site during construction as described in the text. Additional pollutants introduced to the site as a result of construction and operation, including petroleum/oil/lubricants from heavy equipment and fuel storage required as part of operations will be managed using BMPs as described in the Hazardous Materials section.

Mitigation Measure(s):

None required.

WQ-6 : Would the project otherwise substantially degrade water quality?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Water quality requirements during construction and operation of this site will be managed in accordance with the Federal, State, and local/municipal regulations and building codes as described in the text. BMPs will be employed as part of project design (as required during the building permit process) to prevent runoff leaving the site during construction and operations phases.

Mitigation Measure(s):

None required.

WQ-7 : Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Site ZHQ partially lies within a coastal flood inundation zone. State and local planning agencies will review proposed construction plans. Any proposed structures will need to meet state and local guidelines the reduce the risk potential damage from a inundation flood. This may include placement of structures outside the identified flood zone or raising the elevation of foundation with appropriate erosion control above the base floodplain elevation. With adherence to state and local planning requirements, potential damage from flooding during construction and operations would be less than significant.

Mitigation Measure(s):

None required.

WQ-8 : Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Site ZHQ lies partially within a 100 year floodplain. Dams, levees, or other water storage features are not present upgradient from the site, limiting potential for significant risk of loss, injury, death involving flooding during construction or operations..

Mitigation Measure(s):

None required.

WQ-9 : Would the project result in inundation by seiche, tsunami, or mudflow?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Site ZHQ partially lies within a coastal flood inundation zone and within a tsunami inundation zone. Early warning associated with the Southern California Emergency System would prevent potential injury or harm from an unlikely occurrence of tsunami to workers during construction activity. State and local planning agencies will review proposed construction plans. Any proposed structures will need to meet state and local guidelines the reduce the risk of potential damage from a inundation flood or tsunami. This may include placement of structures outside the identified flood zone or raising the elevation of foundation with appropriate erosion control above the base floodplain elevation. With adherence to state and local planning requirements, potential damage from flooding will be less than significant.

Mitigation Measure(s):

None required.

Land Use Planning

Setting

Is the site on federally owned or administered land?: No

If yes, which agency: N/A

Is the site on state owned or administered land?: No

If yes, which department?: N/A

Is the site located within the Coastal Management Zone?: Yes

If yes, please explain: Malibu Coastal Zone

Is the site located within a Airport Land Use Plan area?: No

If yes, provide name of airfield/airport: N/A

If yes, provide name of applicable Airport Land Use Plan: N/A

Applicable HCP or NCCP: N/A

Local Agency Jurisdiction: Malibu

General Plan Designation: Public Open Space

Zoning: Public Open Space

What is the zoning height restriction, if any?:

28 feet

City or county permit requirements for communication facilities, if any:

Conditional Use Permit

Comprehensive Plan or General Plan Local Agency: Malibu

Los Angeles County Community or Area Plan: N/A

City of Los Angeles Community or Area Plan: N/A

Other Special District, Area or Specific Plan: N/A

Impact Analysis

LU-1: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Site ZHQ is located adjacent to the Pacific Coast Highway on a site that is fully developed, including roof-mounted communication facilities, within the City of Malibu Coastal Zone. The City of Malibu Coastal Zone Land Use Plan was certified by the California Coast Commission on September 13, 2002 and provides for communication facilities as a conditional use in all land use designations. Policies in the Land Use Plan include avoiding or minimizing impacts to Environmentally Sensitive Habitat Areas and scenic resources; avoiding facility visibility from public viewing areas; and co-locating facilities where feasible. Per Local Implementation Plan Policy 3.14.1, the general requirements for every wireless telecommunications facility and antenna include development standards specifying that the maximum height of ground or building-mounted antennae shall not exceed 28 feet. However, if the antennae elements are mounted flush on an existing structure that exceeds 28 feet, the antennae elements may be equal to the height of the building. Roof-mounted antennae may extend no more than 3 feet

about the roof from which they are attached. Per Land Use Plan Policy 6.36, telecommunications facilities along Pacific Coast Highway shall place support facilities underground, where feasible. The proposal is to mount whip and microwave antennas on a proposed 28-foot-tall monopole at the site. The proposal is in compliance with the City of Malibu Coastal Zone Local Implementation Plan section on wireless telecommunications antennae and facilities as well as other city plans, policies, and ordinances.

Mitigation Measure(s):

None required.

LU-2: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

No Habitat Conservation Plan or Natural Community Conservation Plan has been identified that is applicable to this site location.

Mitigation Measure(s):

None required.

Noise

Setting

City: Malibu

Applicable Noise Ordinance: Title 8 Health and Safety, Chapter 8.24 Noise

Noise Level Threshold: N/A; no construction from 7 pm to 7 am on weekdays, before 8 a.m. or after 5 p.m. on Saturday, or any time on Sundays or holidays

ALUP or Within 2 Miles of Public Airport: No

Private Airport in Vicinity: No

Distance to Nearest Off-Site Sensitive Receiver: 25 feet

Ambient Noise Level: 45 dBA

Sensitive Noise Receiver 1: recreation area (beach)

Sensitive Noise Receiver 2: Single Family Residential Dwellings

Sensitive Noise Receiver 3: N/A

Impact Analysis

NOI-1: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

As discussed in Chapter 3.9, Land Use/Planning, the Authority is not subject to certain local land-use plans, policies, and regulations, under the doctrine of intergovernmental immunity (Cal. Gov. Code § 53090(a)). Therefore, the noise level standards and permitted hours of construction established in local general plans and noise ordinance are not necessarily applicable to the Project; however, the Authority will work cooperatively with local jurisdictions and make every effort to comply with local standards and regulations.

Hourly average construction noise levels are anticipated to be approximately 89 dBA. The predicted noise levels represent the demolition phase which is anticipated to be the loudest construction phase. Construction would be scheduled to occur within the specified hours when construction activities are allowed pursuant to the noise ordinances established by the city or county with jurisdiction at the given site. However, in some instances, it may be necessary for construction activities to take place outside of these specified hours due to an accelerated construction schedule or avoidance of peak traffic hours in urban locations requiring night or weekend work.

Because there are no federal or state standards for short-term noise exposure, thresholds for construction noise are based upon local ordinances where they apply. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is applicable to the Authority, this would be a significant impact. If construction outside of specified hours is necessary in a jurisdiction with a noise ordinance that is not applicable to the Authority under the doctrine of intergovernmental immunity, this would not be a significant impact.

The affected jurisdiction has not established a construction noise level threshold. Therefore, construction noise levels at the proposed Project site would not generate noise in excess of standards established in the local general plan or noise ordinance; and impacts during construction of the Project would be less than significant.

Because noise level thresholds have not been established in the local ordinance, a 60 dBA "normally acceptable"

community noise equivalent level (CNEL) developed by the California Department of Health Services was referenced in the analysis of the dominant noise source during Project operation, which is HVAC units for equipment shelters. According to the Air Conditioning, Heating, and Refrigeration Institute standards and Project assumptions, noise emissions from the HVAC systems would be approximately 53 dBA CNEL at 20 feet. In addition, emergency diesel generators would operate intermittently, for backup power purposes. Noise from diesel generators operating inside solid enclosures would be 58 dBA CNEL at 21 feet. Noise levels from both sources would be below the 60 dBA “normally acceptable” level. Therefore, operational noise would not exceed any standards established in a local general plan or ordinance, or applicable standards of other agencies.

Mitigation Measure(s):

None required.

NOI-2: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Groundborne vibration noise levels were calculated and compared to the FTA 80 VdB general assessment guideline for infrequent events. Construction activities for the proposed Project sites would include demolition, site preparation, excavation, and pad construction phases under a maximum construction scenario. Equipment used during these phases that are potential sources of vibration during construction include an excavator, similar to a small bulldozer, 3-ton flatbed truck, dump truck and concrete truck, similar to a loaded truck, and a jackhammer. Groundborne vibration noise levels from construction equipment used for this Project could range from 58 VdB to 86 VdB at a distance of 25 feet. A sensitive receiver (recreation area) is located within 25 feet of Project site ZHQ; therefore, groundborne vibrational noise impacts would be significant.

For areas outside unincorporated Los Angeles County, a construction vibration damage assessment based on criteria, as defined by FTA, was applied. The FTA criteria identify construction vibration ranging from 0.12 peak particle velocity (PPV) in inches per second for buildings extremely susceptible to vibration damage to 0.5 PPV for reinforced-concrete, steel, or timber (no plaster) buildings. Based on these criteria, the estimated vibration levels for equipment that will be used in the construction of the proposed Project sites, specifically loaded trucks, jackhammers, and small bulldozers, vibration damage is estimated at 0.003 to 0.089 PPV at 25 feet. There are no extremely sensitive (fragile) buildings or sensitive receivers within this distance to the site; therefore, impacts from groundborne vibration would be less than significant.

Upon completion of construction, the proposed Project would not require the routine operation of any groundborne noise or vibration-generating equipment. One piece of equipment that would be a potential intermittent source of vibration during the operation of proposed Project sites is a backup generator. Newly manufactured portable generators are typically equipped with rubber mounts or other vibration reducing hardware to isolate the vibratory motion of the operating generator motor from stationary mounting surfaces. Other units incorporate vibration dampening into the motor design. Therefore, extremely sensitive (fragile) buildings and sensitive receivers would not be exposed to excessive groundborne vibration or groundborne noise from Project operation and impacts would be less than significant.

Mitigation Measure(s):

NOI MM 1

Prior to commencement of construction at Site ZHQ, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction vibration impacts. Such measures may include but are not limited to the following:

- Route heavily-loaded trucks away from residential streets, if possible, selecting streets with the fewest homes if no other alternatives are available.

- Operate earth moving equipment including excavators/mini excavators and dump trucks as far away from vibration-sensitive locations as possible.
- Phase demolition and earth-moving operations so as not to occur simultaneously. Total vibration could be significantly less when each vibration event occurs separately.

NOI-3: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: Less than Significant Impact

Discussion:

Although construction activities associated with the proposed Project site would generate increases in noise levels, these increases would be temporary and of short duration. There are no federal or state standards for short-term noise exposure and local noise ordinance for this Project site does not established thresholds for temporary or periodic noise level increases above the ambient noise level.

Applying FTA criteria that establish guidelines for when adverse community reaction to construction noise can occur on a temporary basis, the estimated noise level at 25 feet from proposed sites would be 89 Dba and not exceed the 90 Dba daytime criterion but would exceed the 80 Dba nighttime criterion; therefore, construction noise impacts for this Site would be significant.

For purposes of evaluating whether operation of the Project would result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project, the FTA guidelines for temporary increases above ambient noise levels were also applied.

During operation of the proposed Project sites, emergency diesel generators with a 35 kilowatt (Kw) to 100 Kw power range would operate one hour per month as part of routine maintenance and would operate to provide backup power in the event of a power outage. Noise from diesel generators varies greatly depending on the size and design. Newer models generally have built-in attenuation. The diesel generators used for this Project are assumed to have a noise rating of 68 Dba at 21 feet. Furthermore, the emergency generators would be housed by solid walls, which would attenuate at least 10 Dba. The resulting noise emissions would be 58 Dba at 21 feet or 56 Dba at 25 feet. Receivers are located 25 feet from this project site and with existing ambient noise levels typically ranging from 45 Dba to 60 Dba. Adding the operational noise to ambient conditions would not exceed FTA daytime (90 Dba) or nighttime (80 Dba) thresholds; therefore, impacts from operational noise would be less than significant.

Mitigation Measure(s):

NOI MM 2

• Prior to commencement of construction of Site ZHQ, the contractor shall demonstrate, to the satisfaction of the Authority, measures that will reduce construction noise impacts below the levels specified in FTA nighttime threshold. Such measures may include but are not limited to the following:

- Use noise blankets or other muffling devices on equipment and quiet-use generators at noise-sensitive receivers.
- Use well-maintained equipment and have equipment inspected regularly.
- Operate construction equipment for periods of fewer than 15 consecutive minutes when possible.

NOI-4: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within an airport land use plan or within two miles of a public airport. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

NOI-5: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

This site is not located within the vicinity of a private airstrip. Therefore, construction of this site would not expose people to excessive noise levels. After construction, the sites will be unmanned during operation except for occupational maintenance. Therefore, operation of the project would not expose people residing or working in the project area to excessive noise levels.

Mitigation Measure(s):

None required.

Recreation

Setting

California Coastal Zone: Yes

If yes, Plan or Designation Area: City of Malibu Local Coastal Program, Land Use Plan

Angeles National Forest: No

If yes, Plan or Designation Area: N/A

On National Park Service Land within the Santa Monica Mountains National Recreation Area: No

If yes, Plan or Designation Area: N/A

National or California State Park: No

If yes, Plan or Designation Area: N/A

Located in the Vicinity of Trails: No

Trail Name: N/A

Parks and other Recreational Areas: Yes

Other Recreational Area Names: Zuma Beach County Park

REC-1: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Development of the LMR site would not result in an increased use of parks or other recreational facilities. Communication facilities would not serve as an attraction that would increase visitation of existing parks or recreation areas. The construction work force would be obtained from the local population so there would be no increase in the general population to put additional demand on the existing recreational facilities or prompt the need to expand on existing parks and other recreational facilities. While the proposed project is within or near areas used for recreation, the proposal is an expansion of or addition of equipment to an existing facility with communications equipment. Consequently, the proposed changes would not substantively change the recreation experience to those visiting the general vicinity. There is existing access to the site, and the proposed action to further develop the site would not change access to parks or other recreational facilities in near proximity to the LMR site.

Mitigation Measure(s):

None required.

Transportation

Setting

Conflicts With Plan/Ordinance Protecting the Effectiveness of Circulation System: No

Applicable Congestion Management Program: LA Congestion Management Program

County Congestion Management Road or Highway: Pacific Coast Hwy

Distance (Miles):

Disaster Route: Highway 1/Pacific Coast Highway

Transit, Bicycle, or Pedestrian Facilities: No

Within Vicinity of Aviation Facility: No airports within 5 miles

Nearest Highway/Freeway: Us Highway 101

Distance (Miles): 0

Nearest Major Arterial: Highway N-9

Distance (Miles): 1.35

Access to the Project Site Provided Via: Zuma Beach Access Road

Impact Analysis

TRAN-1: Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site does not conflict with an applicable plan, ordinance, or policy associated with the performance of the circulation system (including mass transit, nonmotorized travel, intersections, streets, highways and freeways, pedestrian and bicycle paths) or otherwise decrease the performance or safety of such facilities. No effects on mass transit are anticipated. Any excavated material associated with trenching would be very short term with required access maintained for vehicles, bicycles, and pedestrians. Based on the equipment needs and the typical work force size, an average of 25 trips to each proposed Project site would be made daily during the approximately 6-week construction phase. In this urbanized area, this construction-related traffic would be less than one-quarter of a percent of the average daily traffic.

Mitigation Measure(s):

None required.

TRAN-2: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

The site is within 2 miles of a route identified in the local county Congestion Management Plan, thus increasing

the potential that vehicles accessing the sites for construction or maintenance would contribute to congestion. The effects would be nearly indistinguishable from existing levels of traffic on these routes because the approximately six-week construction period would typically add fewer than 25 round trips by vehicle per work day and the increase in traffic would be less than 1 percent of the average daily traffic for sites near a route in the CMP. Because fewer than 50 trips would be added during either the AM or PM weekday peak hours, the preparation of a transportation impact analysis is not required.

Mitigation Measure(s):

None required.

TRAN-3: Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

There are no airports within 5 miles of the site; air traffic would be expected to be at altitudes high enough that proposed communications system equipment would not change air traffic patterns or pose a substantial safety risk.

Mitigation Measure(s):

None required.

TRAN-4: Would the project result in inadequate emergency access?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

Construction-related traffic would be limited to 25 trips per day at each site, and typically would be less than 1 percent of average daily traffic on nearby streets. Construction-related activities may require lane narrowing at a driveway or detours in the parking lots of existing facilities. These actions could temporarily impair access on adjacent roadways, potentially creating traffic hazards and limiting emergency access, resulting in a significant impact. Vehicle trips generated during operations would not be of sufficient volume to affect the level of service of any roadway. With operation of the LMR system, communications for first responders would be enhanced and provide opportunities for better communications associated with access during emergencies.

Mitigation Measure(s):

TRANS MM 1: The construction contractor shall maintain a minimum of one open lane of traffic at all site access roads during project construction. Use of standard construction traffic control practices such as flagmen, warning signs, and other measures shall be implemented as necessary to ensure that traffic flow remains uninterrupted at all times.

TRANS MM 2: Any temporary road or lane closures that may affect state highways shall be coordinated with Caltrans prior to commencement of construction at the site that will require the road or lane closures. If construction requires temporary road or lane closures on roads and streets managed by local entities, a traffic management plan shall be prepared and submitted to the relevant county and/or city public works department or other appropriate department for approval prior to commencement of construction at the site. Encroachment permits would be obtained where applicable.

Utilities

Setting

Nearest Solid Waste Disposal Facility: Calabasas Landfill

Adequate Disposal Capacity: Yes

Site Served by or has Available Access to Domestic Water System: L A COUNTY WATERWORKS DIST #29

Impact Analysis

UTI-1: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Construction Impact: Significant Impact Reduced to Less than Significant with Mitigation Incorporated

Operational Impact: No Impact

Discussion:

• Where a new monopole or lattice tower would be constructed, some excavation activities for construction of deep foundations could require dewatering. When perched groundwater is encountered for tower support foundations and does meet requirements for discharge to the environment, a groundwater discharge permit would be obtained from the applicable RWQCB and removal or discharge of water would be in accordance with the terms and conditions of the permit. If treatment at a wastewater treatment plant is necessary, each of the wastewater treatment plants identified within the service area of Project sites would have the capacity to address the demand as no more than 20,000 gallons would be expected to be extracted from a given site and the volume of water would be less than 1 percent of the total daily capacity of even the smaller wastewater treatment plants.

Mitigation Measure(s):

UTL MM 1, Discharge Permit: In the event groundwater in sufficient quantity is encountered to require dewatering, a discharge permit would be obtained from the applicable RWQCB prior to construction, and removal or discharge of water would be in accordance with the terms and conditions of the permit.

UTI-2. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Some grading may occur at the site and the addition of up to 4,000 square feet of impermeable surfaces for foundations would increase stormwater runoff where soils on site naturally drain well. Building pads would be designed for positive drainage toward existing natural and/or storm drain catchment areas with the capacity to support the additional runoff associated with new impervious surfaces. No new storm-water drainage facilities or expansions of existing facilities are anticipated as a result of the proposed Project sites.

Mitigation Measure(s):

None required.

UTI-3. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Construction Impact: Less than Significant Impact

Operational Impact: No Impact

Discussion:

Water for dust abatement and other on-site construction uses is projected to be up to 500 gallons for dust

abatement and other on-site construction uses during the approximately six-week duration of construction and would be hauled to each site by water truck or water trailer. Existing water supplies would be used to satisfy the short-term need. The total water requirement for a Project site would be about .0003 percent of the daily treated water supply processed by the LACSD. Water supplies from existing entitlements and resources would be sufficient to serve the Project. No water would be required for operations.

Mitigation Measure(s):

None required.

UTI-4: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Construction Impact: Less than Significant Impact

Operational Impact: Less than Significant Impact

Discussion:

Solid waste would be generated during construction of the proposed Project sites, including up to 50 tons of largely reusable and recyclable construction debris (wood, metal cardboard, waste concrete), and discarded trash. In compliance with California Green Building Standards Code found at Title 24 of the California Code of Regulations, Part 11, Section 5.408.1, waste materials would be reused, recycled, and/or composted to further minimize the volume of waste by at least 50 percent of the construction waste that is generated. Based on the identified applicable landfills for each proposed Project site and the known capacity limits (up to 5,000 tons/day), construction of the Project sites, even without requirements for reuse and recycling, would not exceed the permitted capacity of the landfill(s) serving each Project site.

Once constructed, solid waste generated by the proposed Project would be limited to equipment components that have failed and need to be replaced; such waste generation would be infrequent and small in quantity. Waste from operations would not exceed the permitted capacity of the landfill(s) serving each site.

Mitigation Measure(s):

None required.

UTI-5: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Construction Impact: No Impact

Operational Impact: No Impact

Discussion:

Solid waste generated during construction and maintenance of the LMR sites would be handled in a manner that is consistent with federal, state, and local statutes applicable to the type of solid waste generated.

Mitigation Measure(s):

None required.

5.0 Other CEQA Considerations

5.1 Energy Conservation

Pursuant to CEQA Guidelines Appendix F, an EIR should consider potentially significant energy impacts of a project caused by wasteful, inefficient, or unnecessary consumption of energy. The following section describes existing energy use and systems in the vicinity of the proposed Project, and provides information about the proposed Project's construction, transportation and operational energy impacts.

5.1.1 Environmental Setting

Construction and operation at each of the proposed Project sites would require use of electricity, and a mix of diesel and gasoline; use of natural gas is not anticipated at any site. Power required for construction would consist of gasoline and diesel for vehicles, construction equipment and generators. Once each Project site becomes operational, energy required during normal operating conditions would be provided via electrical utility service, and only minimal gasoline or diesel would be used by maintenance workers visiting the site monthly, and from monthly scheduled testing of the diesel generators. Automatic transfer switches would accommodate automatic transfer of power sources in the event of an electrical utility outage and would be capable of being monitored remotely. During emergency conditions 85 kilowatt diesel-powered emergency generators would power equipment at the site for up to seven days at most sites. Remote sites would be equipped with larger diesel storage tanks to provide up to 14 days of emergency power. Routine maintenance visits and inspections of the Project sites would use a fleet powered by gasoline and diesel engines.

5.1.1.1 Electricity

Based on data from the State of California Energy Consumption Data Management System Los Angeles County consumed approximately 69.9 billion kilowatt hours of electricity (kWh) in 2014 (California Energy Commission 2016a). This would equate to approximately 5.8 billion kWh electricity consumed per month on average.

Electrical service to the proposed Project sites would be provided by four utilities: Glendale Water and Power, Los Angeles Department of Water & Power, Pasadena Water & Power, and Southern California Edison. Consumption by utility is provided in Table 5.1-1.

Table 5.1-1: Electrical Consumption by Utility

Service Provider	Service Area	Utility Consumption (Million KWh)		
		2014	2013	2012
Glendale Water & Power	City of Glendale	1,112.0	1,101.0	1,109.0
Los Angeles Department of Water & Power	City of Los Angeles	21,376.8	22,521.1	23,600.9
Pasadena Water & Power	City of Pasadena	1,126.8	1,143.6	1,098.8
Southern California Edison	Southern California	87,418.4	85,221.6	86,043.5

Source: California Energy Commission 2016b

5.1.1.2 Gasoline and / or Diesel Fuel

Los Angeles County consumed approximately 2.4 billion gallons of gasoline in 2012, 2.5 billion gallons in 2013, and 2.3 billion gallons in 2014 (California Energy Commission 2016). While data was not available for county-wide consumption of diesel fuel, the state Board of Equalization does report that diesel consumption equates to about 19 percent of gasoline usage in the state. Reported and extrapolated gasoline and diesel consumption data are provided in Table 5.1-2

Table 5.1-2: Fuel Consumption in Los Angeles County

Fuel Type (unit)	Los Angeles County Consumption		
	2014	2013	2012
Gasoline (million therms)	2,858	3,129	2,993
Gasoline (million gallons) ¹	2,288	2,505	2,396
Diesel (million gallons) ²	435	476	455

Source: California Energy Commission 2016c, California Board of Equalization 2013

¹Data extrapolated from California Energy Commission 2016c

²Data extrapolated from California Energy Commission 2016c and California Board of Equalization 2013

5.1.2 Regulatory Setting

5.1.2.1 Federal Regulatory Setting

Energy Policy Act of 2005

The Energy Policy Act of 2005 was enacted to promote the usage of renewable energy sources in addition to a reduced reliance on fossil fuels, higher energy efficiency in buildings, and increasing the percentage of alternative fuel vehicles.

Fuel Efficiency Standard

The Federal Government sets fuel efficiency standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horse power (hp) and to be phased in by 2000. In 1998, a new standard was adopted that introduced Tier 1 for all equipment below 50 hp and introduced the Tier 2 and Tier 3 standards. Tier 2 and Tier 3 standards for all equipment were

to be phased in by 2008. Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and were most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles are to be completely phased in by the end of 2015.

Corporate Average Fuel Economy (CAFE) Standards

New federal rules have been adopted that set national GHG emissions standards and will significantly increase the fuel economy of all new passenger cars and light trucks sold in the United States. The National Highway Traffic Safety Administration (NHTSA) has established fuel economy standards that strengthen each year reaching an estimated 34.1 mpg miles per gallon for the combined industry-wide fleet for model year 2016. (See 75 Fed. Reg. 25324 et seq. [May, 7, 2010]).

5.1.2.2 State Regulatory Setting

Executive Order S-1-07

Executive Order S-1-07, which was signed by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California. It establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least 10 percent by 2020. As a result of this order, CARB approved a proposed regulation to implement the Low Carbon Fuel Standard (LCFS) on April 23, 2009, which would reduce GHG emissions from the transportation sector in California by about 16 MMT by 2020. The LCFS is designed to reduce California's dependence on petroleum, create a lasting market for clean transportation technology, and stimulate the production and use of alternative, low-carbon fuels in California. The LCFS is designed to provide a durable framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework establishes performance standards that fuel producers and importers must meet each year beginning in 2011.

California Renewable Portfolio Standard

Established in 2002 under SB 1078, and accelerated by SB 107 [2006] and SB 2 [2011], California's RPS obligates investor-owned utilities, energy service providers and community choice aggregators to procure 33 percent of their electricity from renewable energy sources by 2020. The California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) are jointly responsible for implementing the program. Renewable energy generation data for the utility service providers in the Project area is described below in Table 5.1-3.

Table 5.1-3: Renewable Energy Generation

Service Provider	Year	Renewable Energy Sources	Percentage of Energy Sales
Glendale Water & Power	2014	Hydroelectric, solar, landfill gas, and geothermal	20%
Los Angeles Department of Water & Power	2013	Wind, landfill gas, and solar	20%
Pasadena Water & Power	2014	Solar, geothermal, and landfill gas	20%
Southern California Edison	2014	Geothermal, wind, solar, hydroelectric and landfill gas	23.5%

Sources:
 Glendale Water & Power 2014 Annual Report
 Pasadena Water & Power 2014 Annual Report
 Los Angeles Department of Water & Power 2013 Annual Report
 Southern California Edison 2014 Annual Report

Executive Order B-30-15 (EO B-30-15)

A new statewide goal for the reduction of greenhouse gas emissions was established by Governor Edmund G. Brown on April 29, 2015. Achievement of the reduction target of 40 percent below 1990 levels by 2030 established in EO B-30-15, coupled with the Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350), will result in substantial carbon emissions reductions due to increasing statewide usage of renewable energy to 50 percent by 2030.

5.1.3 Significance Criteria:

- 1) Would construction of the proposed Project use large amounts of energy or use energy in a wasteful manner?
- 2) Would operation of the proposed Project use large amounts of energy or use energy in a wasteful manner?
- 3) Would the proposed Project result in the construction or expansion of energy infrastructure that would cause significant environmental effects?

5.1.4 Impact Analysis

As noted earlier in this section, the guidance on energy conservation in CEQA Guidelines Appendix F is based on the statutory requirement that the mitigation measures in an EIR include “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy” (Pub. Resources Code Section 21100(b)(3)). Consistent with this mandate, CEQA Guidelines Appendix F lists possible energy impacts and potential conservation measures that should be considered in an EIR when they are “applicable or relevant to the project” and the impacts are “potentially significant.” Appendix F does not mandate the analysis of particular energy-related impacts or include specific significance criteria by which to measure a project’s energy impacts. However, the Authority has determined that application of the following significance criteria are appropriate for use in this EIR and will allow it to determine whether

construction and operation of the proposed Project would result in the wasteful, inefficient or unnecessary consumption of energy.

Impact Energy-1: Would construction of the proposed Project use large amounts of energy or use energy in a wasteful manner?

Construction Impacts

Construction of the proposed Project would require the use of electricity and gasoline and / or diesel fuel.

Construction of the proposed Project would utilize electrical service, which is currently available at the majority of proposed Project sites via Southern California Edison, Los Angeles Department of Water & Power, Pasadena Water & Power, and Glendale Water & Power, and from generators. Electrical demand during construction would be minimal, and required only for operation of power hand tools, occasional lighting, and other minor equipment needed to build each site over a six week period. Electrical demand during would be temporary and likely less than 100 kWh per day. This is considered de minimis compared to 69.9 billion kWh of electricity consumed in Los Angeles County in 2014 (which would equate to approximately 192 million kWh per day). Construction of the proposed sites would not use large amounts of electricity and would not use it in a wasteful manner and impacts associated with use of energy during construction. Impacts would be less than significant.

Assumptions for the vehicle types, the number of trips, and other equipment used during construction of a proposed Project site are provided are provided in Appendix B. This equipment and usage is based on a hypothetical worst case scenario (also referred to as a composite site) relative to the maximum extent of site preparation activities, such as demolition and grading, and construction of the tower and ancillary facilities. Based on this worst case scenario if all equipment at the site was powered by gasoline each site would utilize approximately 6,912 gallons of fuel during construction totaling approximately 373,000 gallons of fuel for 54 sites. If all fuel used at each site were diesel, this would compare to 435,000,000 gallons used in 2014 in Los Angeles County, or about .08 percent of total construction. If all fuel used at each site were gasoline (total use of 2.288 billion gallons in 2014) total fuel use consumed during construction would be approximately 0.016 percent of total 2014 usage in Los Angeles County. Use of fuel during construction would be temporary. Construction of the proposed sites would not use large amounts of gasoline or diesel fuel and would not use it in a wasteful manner. Impacts associated with use of fuel for energy during construction would be less than significant.

Mitigation Measures

No mitigation measures are required.

Operational Impacts

Impact Energy-2: Would operation of the proposed Project use large amounts of energy or use energy in a wasteful manner?

Operation of the proposed Project sites would require electricity for the radio equipment and air conditioning units within the shelters along with security and FAA compliant lighting, where applicable. With the exception of three remote locations (sites GMT, JOP, and PMT) which are off the power grid, the proposed Project sites would utilize power that is either currently available at the sites.

Operation and maintenance of each proposed Project site would have a maximum power draw in the range of approximately 15 to 52 kWh. An average of 35 kWh was used to estimate a site's monthly consumption. This value would equate to 25,550 kWh per month per site, or 306,600 kWh per year per site. Total electrical use at 54 sites would be approximately 16.6 million kWh per year, or about 0.002 percent of total annual electrical demand in Los Angeles County.

Southern California Edison, Los Angeles Department of Water & Power, Glendale Water & Power, and Pasadena Water & Power would supply the electricity for the vast majority of Project sites. The electricity derived from these utility providers for operation of the Project would not cause a substantial increase in demand for energy production and would not require the construction of or need for additional energy generation facilities. As shown above in Table 5.1-3, electric utility service providers in the Project area are meeting or exceeding the current state regulations for the use of renewable energy. As such, the electricity requirements for operation of the proposed Project would result in a less than significant impact relative to the use of large amounts of energy or use energy in a wasteful manner. Operational impacts would be less than significant.

Operation of the proposed Project would require a minimal amount of diesel stored in the storage tanks used to fuel the emergency generators. The use of alternative fuels, such as biodiesel for the generators as well as maintenance vehicles would be considered during final design of the proposed Project sites. Maintenance visits to the proposed Project sites and annual inspections will require a minor amount of fossil fuel, which may be either gasoline or diesel, depending on the vehicles required for maintenance operations. In addition, the total number of vehicle trips is anticipated to be less than existing conditions due to the consolidation of LMR service, which would reduce the number of jurisdictions visiting the sites for maintenance and inspections. Vehicle trips to the proposed Project sites and fuel to power diesel generators would not result in use large amounts of energy. Consumption of fuel during operation of the project would not use large amounts of energy or use fuel in a wasteful manner. Operational impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Impact Energy-3: Would the proposed Project result in the construction or expansion of energy infrastructure that would cause significant environmental effects?

Construction Impacts

As noted under Impact Energy 2, demand for electricity during construction would be minimal at each proposed project site. There would be no potential for construction of the proposed Project to result in

construction or expansion of energy infrastructure. Impacts would be less than significant for this threshold.

Mitigation Measures

No mitigation measures are required.

Operational Impacts

The 16.6 million kWh annual operational demand of the proposed Project is minor compared to nearly 70 billion kWh annual demand in Los Angeles County and would be met without the need for new generation facilities or new transmission lines. As such, the electricity requirements for operation of the proposed Project would result in a less than significant impact relative to need for construction or expansion of energy infrastructure to accommodate the project.

Mitigation Measures

No mitigation measures are required.

5.2 Growth-Inducing Impacts

CEQA requires an EIR to describe any growth-inducing impacts of the proposed project (Pub. Res. Code Section 21100(b)(5); CEQA Guidelines Section 15126.2(d).) An EIR must discuss “the ways” in which the project could directly or indirectly foster economic or population growth or the construction of additional housing in the surrounding environment. (CEQA Guidelines Section 15126.2(d).) The discussion should also describe growth-accommodating features of the project that may remove obstacles to population growth. In addition, characteristics of the project that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively, need to be addressed.

Significant growth impacts could occur if a project provides infrastructure or service capacity to accommodate growth levels beyond those permitted by local or regional plans and policies. New employees hired for proposed commercial and industrial development projects and population growth resulting from residential development projects represent direct forms of growth. A project would indirectly induce growth if it would increase the capacity of infrastructure or facilities in an area in which the public service currently meets demand.

The proposed Project is designed to improve communications among emergency responders in Los Angeles County. It would entail installation of telecommunications facilities to support emergency response communications and would not improve commercial communications systems available to the general public. It would not provide infrastructure or service capacity to accommodate economic or population growth. It would not increase capacity or extend infrastructure for public use.

The current state of emergency response communications in Los Angeles County is not identified as an impediment to growth; therefore, improving emergency response communications would not remove an obstacle to population growth and is not growth-inducing.

5.3 Radiofrequency Exposures

The FCC is responsible for evaluating the effect of exposure from FCC-regulated transmitters on the quality of the human environment. Safe radiofrequency (RF) exposure limits are specified by the FCC in terms of maximum permissible exposure (MPE) limits that vary with frequency. The requirements for RF-electromagnetic energy exposure compliance are contained in FCC Office of Engineering and Technology (OET) Bulletin 65, *Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields* (FCC 1997).

The FCC has established an occupational/controlled MPE of 5 milliwatts per square centimeter (mW/cm^2) and an uncontrolled MPE of $1 \text{ mW}/\text{cm}^2$ for equipment that operates above the 1500-MHz frequency range. For equipment operating at 700 MHz, the occupational MPE is $2.83 \text{ mW}/\text{cm}^2$ and an uncontrolled MPE of $0.57 \text{ mW}/\text{cm}^2$. The occupational/controlled exposure limits apply in situations in which persons are exposed during employment or are otherwise temporarily in a location where these limits apply. Application of this limit can be used only when individuals are fully aware of the potential for exposure and can therefore exercise control over that exposure. The general population / uncontrolled exposure limits apply in situations where persons may not be fully aware of the potential for exposure and, therefore, do not exercise control over exposure. The FCC further requires that antenna sites be placarded, that workers be trained to preclude any potential occupational exposures at sites, and that other control measures such as fencing out unauthorized persons and/or shielding of antennas are put into place, where warranted.

Operation of antenna equipment at proposed Project sites would produce RF emissions. RF emissions from operation of each site are not permitted to exceed the MPE standards established by the FCC as set forth in 47 CFR Sections 1.1307 and 1.1310. To comply with this legal standard at each operational site, the Authority will require its contractor to perform an RF emission safety study prior to construction that will model the RF emission level from all equipment on site and demonstrate that it complies with the FCC guidelines and regulations on MPE for the General Public / Uncontrolled and for the Occupational / Controlled groups per the FCC's OET Bulletin 65. After installation of the proposed Project site equipment and prior to operation, the contractor will conduct field measurements to confirm RF emission levels are in compliance and will identify, resolve, and correct any noncompliance (including posting appropriate signage) until compliance can be demonstrated.

Radiofrequency exposures at proposed LMR project sites would be managed in accordance with applicable regulations contained in OET Bulletin 65.

5.4 Significant and Unavoidable Environmental Effects of the Project

CEQA Guidelines Section 15126.2(b) requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” Impacts for every resource category required under CEQA were evaluated in Chapter 3.0, and mitigation measures were included for those impacts that were determined to be significant. Thresholds of significance were used to identify potential effects on the environment that could result from construction and operation of the proposed Project. Using Appendix G, *Environmental Checklist* of the CEQA Guidelines, the evaluation of environmental effects led to the categorization of impacts into the following four categories:

- No Impacts
- Impacts found to be less than significant – Minor impacts or changes to the existing situation may occur either temporarily or permanently but are not significant in either case.
- Impacts found to be significant but reduced to less than significant with mitigation – Impacts would occur, but they can be mitigated to less than significant levels.
- Impacts found to be significant and unavoidable – Significant impacts would occur and cannot be reduced to less than significant levels with mitigation measures.

This section identifies project impacts that, even with the implementation of all identified mitigation measures, would remain potentially significant, and are therefore considered unavoidable.

5.4.1 Aesthetics

AES-1: Would the project have a substantial adverse effect on a scenic vista?

Significant impacts have been identified at sites H-69B and JOP. The only potential measure to mitigate impacts at these sites is painting the towers to blend with their visual settings, but this measure is infeasible as FAA guidelines (FAA Advisory Circular 70/7460-1L) govern the paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain significant if they were painted to blend with the site’s visual setting. As such, no feasible mitigation measures exist to reduce the impacts to less than significant levels. Therefore, impacts are significant and unavoidable at sites H-69B and JOP.

AES-3: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Significant impacts have been identified at sites H-69B and JOP. The only potential mitigation measure available is to paint the new facilities to blend with the site’s visual setting. This measure is infeasible. FAA guidelines (FAA Advisory Circular 70/7460-1L) require specific paint colors to be used on towers for aviation safety purposes. Additionally, the visual impact of the towers would remain significant if they were painted to blend with the site’s visual setting. As such, no feasible mitigation measures were

identified to reduce the impacts to less than significant levels. Therefore, impacts are significant and unavoidable at sites H-69B and JOP.

5.4.2 Cultural Resources

CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

As discussed below, Given the magnitude of the ground disturbance and the extent of the resources present at Project sites H-69B, LACFCP08, LACFCP09, and LPC, even with implementation of the required mitigation measures, impacts would not be reduced to less than significant levels. Therefore, impacts at these four Project sites would be significant and unavoidable.

Site H69-B. Archaeological monitors would be required during all ground-disturbing activities at Project site H-69B. Because of the proximity of archaeological resources to the Project construction area, access to archaeological areas would also be restricted to all construction and operational personnel. With implementation of CUL MMs 1, 3, and 4 impacts would be minimized; however, given the magnitude of the ground disturbance and the location and extent of the resources present at this project site, mitigation measures would not reduce impacts to less than significant levels.

Standard approaches to mitigation for towers (painting/camouflage) (I.E., CUL MM 5), particularly for towers of this height, would not be effective and would not reduce the visual impacts to less than significant levels. In addition, the painting of tall telecommunications towers is controlled by FAA Advisory Circulars 47 CFR § 17.21-17.58 to prevent aviation hazards; therefore, painting would not be a feasible mitigation at this Project site.

Site LACFCP08. Archaeological monitors would be required during all ground-disturbing activities at Project site LACFCP08. In addition, the proposed monopole would be out of character with the Cold War-era Nike landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MMs 2, 3, and 5 impacts on historical resources would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures referenced and discussed above, impacts would not be reduced to less than significant levels. Therefore, impacts at this Project site would be significant and unavoidable.

Site LACFCP09. Archaeological monitors would be required during all ground-disturbing activities at Project site LACFCP09. In addition, the proposed monopole would be out of character with the Cold War-era Los Pinetos Nike Missile Site landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MMs 2, 3, and 5 impacts on historical resources would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures referenced and discussed above, impacts would not be reduced to less than significant levels. Therefore, impacts at this Project site would be significant and unavoidable.

Site LPC. Archaeological monitors would be required during all ground-disturbing activities at Project site LPC. In addition, the proposed monopole would be out of character with the Cold War-era Los Pinetos Nike Missile Site landscape; therefore, camouflage of the monopole would be required. With implementation of CUL MMs 2, 3, and 5 impacts would be minimized; however, given the magnitude of the ground disturbance and the extent of the resources present at this project site, even with implementation of the required mitigation measures referenced and discussed above, impacts would not be reduced to less than significant levels. Therefore, impacts at this Project site would be significant and unavoidable.

CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.

At Project site H-69B, impacts on prehistoric archeological resources would be significant. Based on the nature of this site, the location of project activities, and the extent and location of the resources CUL MM 1, CUL MM 3, and CUL MM4 would be implemented to minimize impacts; however, the impacts would remain significant and unavoidable (see CUL 1, Chapter 4, and Appendix B4).

At Project sites LACFCP08, LACFCP09, and LPC, impacts on historic archeological resources would be significant. Based on the historical significance of these project sites and the extent and location of the resources CUL MM 2 and CUL MM 3 would be implemented to minimize impacts; however, the impacts would remain significant and unavoidable (see CUL 1, Chapter 4, and Appendix B4).

CUL-4: Would the project disturb any human remains, including those interred outside formal cemeteries.

CUL MMs 1, 3, and 4 are proposed for Project site H-69B ; however, given the type of project activities and the extent of archaeological resources at this site, mitigation measures would not reduce impacts to less than significant levels.

CUL-5: Would the project cause a substantial adverse change in the significance of a Tribal cultural resource as defined in Public Resources Code Section 21074.

CUL MMs 1, 3, and 4 are proposed for Project site H-69B ; however, given the type of project activities and the extent of archaeological resources at this site, mitigation measures would not reduce impacts to less than significant levels.

6.0 Agencies and Persons Consulted

Federal

Federal Communications Commission	
Federal Preservation Officer	Stephen DeSordo
Deputy Federal Preservation Officer	Jill Springer
Federal Emergency Management Agency	
Regional Environmental Officer, Region IX.....	Alessandro Amaglio
Deputy Regional Environmental Officer, Region IX	Jill Dale
U.S. Department of Agriculture, Forest Service, Angeles National Forest	
Lands Program Manager	Lorraine Gerchas
Telecommunications Group.....	Ernesto Guijarro
U.S. Fish and Wildlife Service	
Biologist, Ventura Field Office	Colleen Draguesku
Biologist, Ventura Field Office	Lara Drizd

State

California Office of Historic Preservation	
State Historic Preservation Officer	Julianne Polanco
State Historian II, Registration Unit	Michelle Messinger
State Historian II, Architectural Review and Environmental Compliance Unit.....	Mark Beason
Native American Heritage Commission	Dave Singleton

Regional

Antelope Valley Air Quality Management District	
Air Quality Engineer	Vickie Rausch
Deputy Director Mojave Desert Operations.....	Alan De Salvio
South Coast Air Quality Management District	
Program Supervisor, Planning, Rule Development and Area Resources.....	Jillian Wong, PhD
Program Supervisor, Planning, Rule Development and Area Resources.....	Michael Krause

County of Los Angeles

Department of Regional Planning	
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 - Director Kathleen Tropa
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City of Torrance, Community Development Department Kevin (last name not provided)

City of West Hollywood, Community Development Department
Historic Preservation Planning Manager David DeGrazia

City of Westlake Village, Planning Department
Director Scott Wolfe
Assistant Planner John Novi

City of Whittier, Community Development Department
Acting Director Rick Hartmann
Planning County TechBrooke Daley

Native American Tribes, Organizations, and Individuals

Cahuilla Band of Mission Indians, Anza, California
Chairman..... Luther Salgado, Sr.

Colorado River Indian Tribes, Parker, Arizona
Museum Director Wilene Fisher-Holt

Chemuevi Tribe, Havasu Lake, California
Secretary/Treasurer Ronald Escobar



Eastern Shoshone Tribe, Fort Washakie, Wyoming	
Tribal Historic Preservation Officer.....	Wilfred J. Ferris III
Fort Mojave Indian Tribe, Mohave Valley, Arizona	
Cultural Society Director	Linda Otero
Gabrieliño	
Kizh Nation, Covina, California	
Chairperson.....	Andrew Salas
Gabrieliño/Tongva San Gabriel Band of Mission Indians, San Gabriel, California	
Chairperson.....	Anthony Morales
Gabrieliño -Tongva Tribe, Los Angeles, California	
Co- Chairperson	Bernie Acuna
Gabrieliño -Tongva Tribe, Los Angeles, California	
Co- Chairperson	Linda Candelaria
Gabrieliño -Tongva Tribe, Los Angeles, California	Conrad Acuna
Tongva Ancestral Territorial Tribal Nation, Marina Del Ray, California	
Tribal Administrator.....	John Tommy Rosas
Gabrieliño -Tongva Indians of California Tribal Council, Bellflower, California	
Tribal Chair, Cultural Resources.....	Robert Dorame
Gabrieliño/Tongva Nation, Los Angeles, California	
Cultural Resources Director	Sam Dunlap
Gabrieliño/Tongva Nation, Los Angeles, California	
Chairperson.....	Sandonne Goad
Los Coyotes Reservation, Warner Springs, California	
Chairman.....	Shane Chapparosa
Morongo Band of Mission Indians, Banning, California	
Director of Planning	Franklin A. Dancy
Paiuma/Yuima Band of Mission Indians, Pauma Valley, California	
Chairman.....	Randall Majel
Ramona Band of Cahuilla Indians, Anza, California	
Cultural Resources Coordinator.....	John Gomez
San Manuel Band of Mission Indians, Highland, California	
CRM Specialist.....	Ann Brierty



Santa Ynez Band of Chumash Indians, Santa Ynez, California	
Cultural Preservation Consultant.....	Freddie Romero
Soboba Band of Luiseño Indians, San Jacinto, California	
Director of Cultural Resources.....	Joseph Ontiveros
Twenty Nine Palms Band of Mission Indians, Coachella, California	
Chairman.....	Darrell Mike
Timbisha Shoshone Tribe, Bishop, California	
Chairman.....	George Gholson

7.0 List of Acronyms and Abbreviations

Acronym/Abbreviation	Term
AB	California Assembly Bill
ACECs	Areas of Critical Environmental Concern
ACHP	Advisory Council on Historic Preservation
ACM	asbestos containing materials
AIRFA	American Indian Religious Freedom Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ALUP	Airport Land Use Plan
amsl	above mean sea level
ANF	Angeles National Forest
APE	Area of Potential Effect
ARPA	Archaeological Resources Protection Act
ASTM	American Society for Testing and Materials
Authority	Joint Powers Authority
AVAQMD	Antelope Valley Air Quality Management District
BA	Biological Assessment
BACT	Best Available Control Technology
BGEPA	Bald and Golden Eagles Protection Act
bgs	below ground surface
BHP	brake horsepower
BLM	Bureau of Land Management
BMP	Best Management Practices
BP	Before Present
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emission Estimator Model
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCA	California Coastal Act
CCC	California Coastal Commission
CCNM	California Coastal National Monument
CCR	California Code of Regulations
CDC-CGS	California Department of Conservation, California Geological Survey
CDCA	California Desert Conservation Area
CDFW	California Department of Fish and Wildlife
CEQ	Council of Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System

Acronym/Abbreviation	Term
CESA	California Endangered Species Act
CFCG	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CM	Construction Measures
CMP	Congestion Management Program
CMU	concrete masonry unit
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
Council	Advisory Council on Historic Preservation
County	Los Angeles County
COW	Cell on Wheels
CPUC	California Public Utilities Commission
CRA	Coastal Resource Area
CRHR	California Register of Historical Resources
CSC	California Species of Special Concern
CSP	California State Parks
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	cubic yards
CZMA	Coastal Zone Management Act
dB	decibel
dba	A-weighted decibels
DHS	Department of Homeland Security
DPM	diesel particulate emission
DPR	California Department of Parks and Recreation
DRECP	Desert Renewable Energy Conservation Plan
DSRA	disturbed sensitive resource area
DTSC	Department of Toxic Substance Control
EA/IS/MND	Environmental Assessment/Initial Study/Mitigated Negative Declaration
ECA	Essential Connectivity Area
EFH	essential fish habitat
EIR	Environmental Impact Report
EO	Executive Order
EPA	state Environmental Protection Agency
ESA	Endangered Species Act
ESHA	environmentally sensitive habitat area
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
FGC	Fish and Game Code
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FLPMA	Federal Land Policy and Management Act

Acronym/Abbreviation	Term
FMMP	Farmland Mapping and Monitoring Program
FOIA	Freedom of Information Act
FOP	Federal Operating Permit
FR	Federal Register
FRM	Federal Reference Method
FSC	Federal Species of Concern
FT	foot/feet
FTA	Federal Transit Administration
FUDS	Formerly Used Defense Site
GBN	ground-borne noise
GBV	ground-borne vibration
GDIT	General Dynamics Information Technology
GHG	greenhouse gas
GIS	geographic information system
GMP	General Management Plan
GPS	global positioning system
HAPC	habitat areas of particular concern
HCM	Historical Cultural Monument
HCP	habitat conservation plan
HI	hazard index
HMA	Hillside Management Areas
HMTA	Hazardous Materials Transportation Act
HSWA	Hazardous and Solid Waste Act
HVAC	heating, ventilation, and air conditioning
I-5	Interstate 5
I-15	Interstate 15
I-40	Interstate 40
IC	Information Center
IPaC	Information Planning and Conservation
IPCC	International Panel on Climate Change
IS	Initial Study
kV	kilovolt
kW	kilowatt
kWh	kilowatt-hour
LA	Los Angeles
LAX	Los Angeles International Airport
LACDPW	Los Angeles County Department of Public Works
LACDRP	Los Angeles County Department of Regional Planning
LACFCD	Los Angeles County Flood Control District
LACM	Los Angeles County Museum
LACSD	Sanitation Districts of Los Angeles County
LADWP	Los Angeles Department of Water and Power
LA-RICS	Los Angeles Regional Interoperable Communication System
LARWQCB	Los Angeles Regional Water Quality Control Board
lbs./day	pounds per day
LCP	Local Coastal Program
L _{dn}	day-night equivalent noise level measured over a 24-hour period
LED	light-emitting diode

Acronym/Abbreviation	Term
L _{eq}	equivalent sound level
LF	linear foot/feet
L _{max}	maximum noise level during a measurement period or noise event
L _{min}	minimum noise level during a measurement period or noise event
LIP	Local Implementation Program
LLC	Limited Liability Company
LMP	Land Management Plan
LMR	Land Mobile Radio
LOS	Level of Service
LPP	Land Protection Plan
LRWQCB	Lahontan Regional Water Quality Control Board
LST	local significance threshold
LUST	leaking underground storage tank
Ma	million years
MBTA	Migratory Bird Treaty Act
MDAB	Mojave Desert Air Basin
MDAQMD	Mojave Desert Air Quality Management District
mgd	million gallons per day
MHz	megahertz
MICR	maximum individual cancer risk
MMRP	Mitigation Monitoring and Reporting Plan
mpg	miles per gallon
mph	miles per hour
MSA	Magnuson-Stevens Fishery Conservation and Management Act
MSDS	Material Safety Data Sheet
MYBP	million years before present
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves and Repatriation Act
NAHC	Native American Heritage Commission
NALMA	North American Land Mammal Age
NCCP	Natural Community Conservation Planning
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NFMA	National Forest Management Act
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
NPS	National Park Service
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NOA	naturally occurring asbestos
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service

Acronym/Abbreviation	Term
NRA	National Recreation Area
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OPR	(California) Governor's Office of Planning and Research
OHVs	off-highway vehicles
OSHA	Occupational Safety Health Administration
PA	Programmatic Agreement
Pb	lead
PCH	Pacific Coast Highway, also State Route 1
PCT	Pacific Crest Trail
PCTA	Pacific Crest Trail Association
PIZ	project impact zone
P.L.	Public Law
PM	particulate matter
PM ₁₀	Respirable Particulate Matter
PM _{2.5}	Fine Particulate Matter
Porter-Cologne	Porter-Cologne Water Quality Control Act
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Project	the LA-RICS LMR Project
PRPA	Paleontological Resources Preservation Act
PUC	Public Utilities Code
RCNM	FHWA Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RHR	Regional Haze Rule
RMP	Resource Management Plan
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan / Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAC	Scenic Attractiveness Class
SANBAG	San Bernardino Associated Governments
SARA	Superfund Amendments and Reauthorization Act
SBC	San Bernardino County
SBCDPW	San Bernardino County Department of Public Works
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCIC	Southern California Indian Center
SDEF	San Dimas Experimental Forest
SEA	Significant Ecological Area
SERA	Significant Ecological Resource Area
SF	square foot/feet
SHPO	California State Historic Preservation Officer

Acronym/Abbreviation	Term
SIO	scenic integrity objectives
SIP	State Implementation Plan
SMMC	Santa Monica Mountains Conservancy
SMMNRA	Santa Monica Mountains National Recreation Area
SMS	Scenery Management System
SMSA	standard metropolitan statistical area
SO ₂	sulfur dioxide
SOI, Secretary	Secretary of the Interior
SPCC	spill prevention, control and countermeasure
SPL	sound pressure level
SR-	California State Route
SRA	sensitive receptor area
SSC	Species of Special Concern
SUV	sport utility vehicle
SWPPP	Stormwater Pollution and Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
THPO	Tribal Historic Preservation Officer
TIA	transport impact analysis
TOWAIR	FCC landing slope facility calculator tool
UBC	Uniform Building Code
UCLA	University of California, Los Angeles
UHF	ultra high frequency
UPRR	Union Pacific Railroad
U.S.	United States
USACE	U.S. Army Corps of Engineers
U.S.C.	U.S. Code
USCB	U.S. Census Bureau
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VCP	Voluntary Cleanup Program
VdB	vibration velocity level
VMT	vehicle miles traveled
VOC	volatile organic compounds
VRI	visual resources inventory
VRM	Visual Resource Management
WEAP	Worker Environmental Awareness Training
WEMO	West Mojave Conservation Management Plan
WRCC	Western Regional Climate Center
WRP	water reclamation plant

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DRAFT
ENVIRONMENTAL IMPACT REPORT FOR THE
LOS ANGELES REGIONAL INTEROPERABILITY
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM

APPENDIX A
DRAFT EIR SCOPING

A-1: NOTICE OF PREPARATION

A-2: INITIAL STUDY

A-3: NOTICE OF COMPLETION AND DISTRIBUTION LIST



JANUARY 2016

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APPENDIX A-1

NOTICE OF PREPARATION



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Notice of Preparation

Name
CC:
Title, Organization
Address
City, State Zip Code

Los Angeles Regional Interoperable
Communications System
Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, California 91754

Subject: Notice of Preparation of a Draft Environmental Impact Report

Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (JPA) will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed Land Mobile Radio system. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approvals for the project.

The project description, location, and the potential environmental effects are addressed in the Initial Study, which is attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Nancy Yang, project engineer, 2525 Corporate Place, Suite 200, Monterey Park, California 91754 or e-mail nancy.yang@la-rics.org. We will need the name for a contact person in your agency.

Notice of Public Meetings: The LA-RICS JPA has scheduled five public environmental scoping meetings to provide additional opportunity to input. The public meetings are scheduled as follows and will be held at the following locations from 6:30 p.m. to 8:30 p.m.:

Thursday, September 11, 2014
South Coast AQMD Building, Room GB
21865 Copley Drive, Diamond Bar, CA 91765

Tuesday, September 16, 2014
El Camino Real Charter High School, Auditorium
5440 Valley Circle Blvd., Woodland Hills, CA 91367

Monday, September 15, 2014
Stanley Kleiner Activity Building
43011 10th St. West
Lancaster, CA 93534

Wednesday, September 17, 2014
Peck Park Community Center, Auditorium
560 North Western Ave., San Pedro, CA 90732

Thursday, September 18, 2014
City of Lynwood Bateman Hall, Room 2
11331 Ernestine Ave., Lynwood, CA 90262

Date: August 19, 2014

Signature: 

Title: Executive Director

Telephone: (323)881-8291

Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

APPENDIX A-2

INITIAL STUDY

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**INITIAL STUDY FOR THE
LOS ANGELES REGIONAL INTEROPERABLE
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM**



Prepared for:

LA-RICS Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

Prepared by:

Jacobs Engineering
3257 E Guasti Road, Suite 120
Ontario, CA 91761

AUGUST 2014

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Term
Authority	Joint Powers Authority
AVAQMD	Antelope Valley Air Quality Management District
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDC-CGS	California Department of Conservation, California Geological Survey
County	Los Angeles County
CY	cubic yard(s)
DHS	Department of Homeland Security
EIR	Environmental Impact Report
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FT	foot/feet
GHGs	Greenhouse gases
LA-RICS	Los Angeles Regional Interoperable Communications System
LF	linear foot/feet
LMR	Land Mobile Radio
MDAB	Mojave Desert Air Basin
MHz	megahertz
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SF	square foot/feet
SUV	sport utility vehicle
UHF	ultra high frequency
USFS	United States Forest Service

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1 ENVIRONMENTAL CHECKLIST FORM

1. **Project title:** Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) System

2. **Lead agency name and address:**

Los Angeles Regional Interoperable Communications System Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

3. **Contact person and phone number:** Nancy Yang (323) 881-8049

4. **Project location:** multiple sites throughout Los Angeles County (County) and in adjacent areas of Orange and San Bernardino counties

5. **Project sponsor's name and address:**

Los Angeles Regional Interoperable Communications System Joint Powers Authority
2525 Corporate Place, Suite 200
Monterey Park, CA 91754

6. **General plan designation:** varies by site

7. **Zoning:** varies by site

8. **Description of project:**

The Project is to install and operate up to 90 LMR facilities at sites located primarily in Los Angeles County (Figure 1). The LMR sites would contain the infrastructure and equipment necessary to provide voice communications coverage throughout the County for emergency responders. Currently, 120 sites are being considered for the LMR project. Their locations are shown on Figure 1, and Table A-1 in Appendix A-1 provides a list of the sites and their addresses. Of these 120 sites, 88 are included in the current proposed system design. The remaining 32 sites are intended to provide alternate site locations if any of the initial 88 sites are determined to be not viable during the site evaluation, system engineering, and permitting processes or in lease agreement discussions with the property owner and need to be removed from consideration. These alternate sites are included in the project description so that the potential environmental impacts of all sites that could potentially be part of the system are analyzed. A maximum of only approximately 80 to 90 sites would be built, however. These locations are widely dispersed across the County in both urban (intensively developed) and rural (less developed) settings. The settings range from coastal locations to downtown Los Angeles to remote mountain peaks throughout the County and to the northern high desert of the County.

In April 2005, the Regional Interoperable Steering Committee was formed to explore the development of a single, shared communications system for all public safety agencies in the greater Los Angeles region. Initial feasibility studies indicated that by leveraging the various agency efforts, a shared regional communications system would not only be possible but would also best meet the needs of the entire regional public safety community and the general public. As a result, the County of Los Angeles, 82 municipalities, and 3 other public sector entities in the region drafted a Joint Powers Agreement that established the Los Angeles Regional Interoperable Communications System (LA-RICS) Joint Powers Authority (Authority) to create a regional area-wide interoperable public safety communications network. Community anchor institutions associated with the project include police, sheriff, and fire departments, as well as hospitals.

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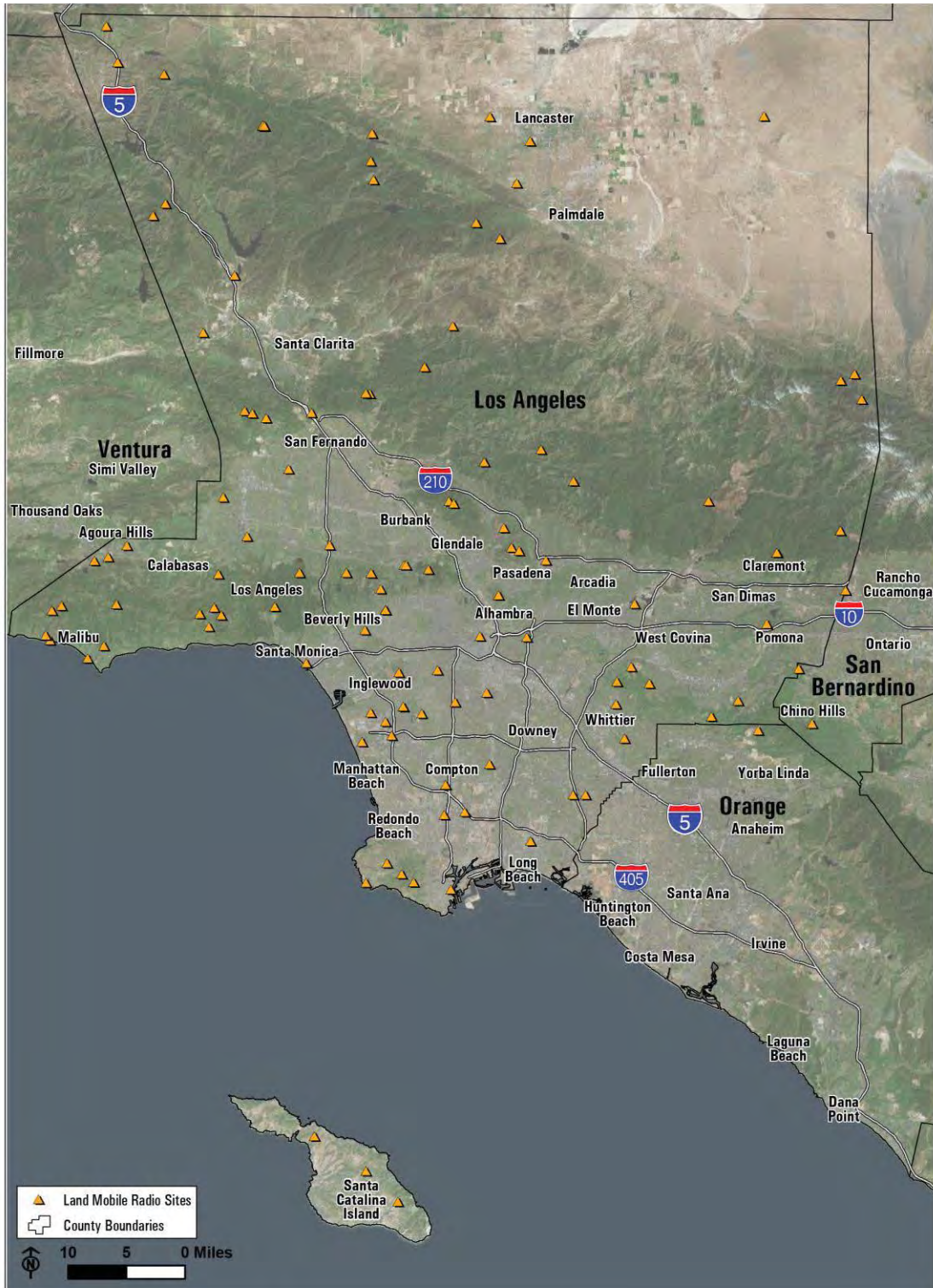


Figure 1. Potential LMR Project Sites

Los Angeles Regional Interoperable Communications System (LA RICS) Land Mobile Radio (LMR) System

The proposed LMR project would be a modern, integrated wireless voice and narrowband data communications system designed and built to serve law enforcement, fire service, health service, and public works professionals throughout Los Angeles County. The new system would provide day-to-day communications within and among agencies and allow seamless interagency communications when responding to routine, emergency, and catastrophic events. The system would be comprised of four different subsystems:

1. Digital Trunked Voice Radio System – provides first responders radio communications utilizing digital technology. It seamlessly operates on two bands of spectrum (700 megahertz [MHz] and ultra high frequency [UHF])
2. Analog Conventional Voice Radio System – provides first responders radio communications utilizing conventional analog technology
3. Los Angeles Regional Tactical Communications System – consists of local, state, and federal interoperability channels in four different bands of spectrum in order to allow outside agencies responding to events in the County to have designated channels for communications
4. Narrowband Mobile Data Network – a data system that provides critical dispatch communications

Purpose of the Project

Effective radio communication is critical in helping police officers prevent and respond to crime situations, keeping firefighters safe as they fight blazes, facilitating life-saving exchanges of information between emergency medical service professionals and hospitals, and allowing public works and utilities the opportunity to coordinate responses to disasters and special events. LMR would support a rapid, safe, and effective public safety response during daily operations. Additionally, it would support a faster, better-coordinated, large-scale response to emergencies such as wildfires, earthquakes, civil disturbance, or other disasters. It would replace the existing aging patchwork of LMR systems with a single county-wide network and would improve overall system capacity and coverage for first and second responders region-wide. Specifically, LMR would provide day-to-day voice and narrowband data radio communications for public safety agencies in the Los Angeles region, enable interoperability among member agencies and mutual aid providers, and support communication with regional, state, and federal agencies in the event of a natural or man-made disaster.

The Los Angeles region is designated as a high-threat area by the Department of Homeland Security (DHS). The new LMR system would allow the region to respond effectively, if an incident were to occur, by providing an efficient and coordinated response to emergencies that presently is not possible in the Los Angeles metropolitan region.

Each of the sites identified for potential use in the LMR project would improve emergency communications within Los Angeles County. The new infrastructure would add capacity, replace existing aging infrastructure with infrastructure that meets current building codes and telecommunications industry standards that better support modern technology and provide for more technologically advanced equipment. The towers would follow general engineering practices for vertical and horizontal separation of equipment to lessen the amount of interference that can result from multiple systems on the same tower through greater separation of different radio frequencies. Different spectrum bands perform differently depending on their interaction with other bands. This enhanced separation of equipment would also allow for greater frequency flexibility and would increase overall system coverage and capacity.

Need for the Project

The greater Los Angeles region experiences many man-made and natural incidents that require a rapid, coordinated response among the region's first and secondary responders. Public safety services in the Los Angeles County region are provided by more than 80 public safety agencies represented by approximately 34,000 first responders and 17,000 secondary responders serving more than 10 million residents, tourists, and commuters in

the region. Many of these agencies use systems that have exceeded their natural useful life (i.e., equipment and programming are no longer supported by vendors). Due to the numerous systems in use and the number of agencies, interagency communication is challenging.

Most of the region's public safety telecommunications infrastructure (shelters and towers) do not meet the technical or operational needs of the agencies that utilize them. Many of the aging communications system sites were built to older and now obsolete industry standards and building codes. Structures at these sites no longer meet the more stringent performance and survivability requirements in current industry standards and codes. This causes performance issues that hamper today's public safety and emergency response operations. Besides the overall age of many structures, most do not possess space (whether inside a shelter or on a tower) to add equipment, and in many cases the towers cannot be cost-effectively retrofitted to support additional antennas because they lack structural capacity and/or retrofitting would impact existing operations. Some towers do not have sufficient space to maintain adequate separation between existing and new antennas to minimize physical and electromagnetic interference. Most of the current infrastructure has not undergone a significant rebuild in several decades.

Additionally, the communication systems deployed by agencies in Los Angeles County do not provide the necessary coverage that all users need. This is particularly the case for the Los Angeles County Sheriff's Department and the Los Angeles County Fire Department. These agencies cover large tracts of the county, and their current radio systems are inadequate and/or antiquated. Often, separate but simultaneous incidents require coordinated emergency responses so that adequate and appropriate personnel are dispatched to each incident. The lack of complete coverage sometimes results in the departments not being able to dispatch the nearest team to the incident because of communication problems.

Without adequate capacity on the radio system, even on a daily basis, first responders often struggle to acquire the necessary resources to communicate. The issue is exacerbated on large incidents where a shortage of radio resources greatly impacts operations due to the need for multiple command, tactical, and mutual aid channels. For example, first responders may not be able to request additional resources to assist them in life-threatening situations, hear evacuation orders, or hear broadcasted warning messages from dispatchers. Without adequate capacity to dedicate individual radio channels to individual incidents, the likelihood of interference between units responding to separate incidents is high.

Proposed Project Description

The proposed LMR sites were selected such that voice coverage could be provided over the Authority's service area, which is all of Los Angeles County (see Figure 1), with the fewest number of sites possible. Locations were selected within or adjacent to existing communication facilities to the maximum extent feasible. The sites include a variety of types (e.g., water tanks, rooftops, police and fire stations, hospitals, remote mountaintops, etc.). Most of these locations have existing communications equipment but do not necessarily have communication towers.

Each LMR site would require installation of multiple, new, fiberglass collinear and microwave antennas and supporting indoor communication equipment and backup batteries. Fiberglass collinear and microwave antennas generally would be installed on either existing or new lattice towers or monopoles, as depicted on Figure 2 and Figure 3. The number of antennas installed would vary by site. Because the LMR sites are proposed for a variety of locations ranging from rooftops and urban police and fire stations to undeveloped or sparsely developed hilltops and mountain peaks, the facilities proposed at each site vary depending on what infrastructure is currently present and the topography of the location.

In general, three general infrastructure components are proposed at each LMR site:

- antenna structure which could be a lattice tower, monopole, or building mounts
- equipment shelter

- emergency generator

New infrastructure at a site would include either a lattice tower or a monopole, but not both. At a few sites antennas would be façade-mounted on existing buildings (e.g., rooftops) rather than on a new or existing tower or monopole. Additionally, most sites would require construction of a new shelter to house radio communication equipment, although some sites would utilize an existing equipment room or shelter. Descriptions of existing structures that would be used vary. General descriptions of the four basic structures that may be newly constructed for the LMR project are provided below.

Lattice Tower. New, self-supporting lattice towers would be a maximum of 180 feet tall (without appurtenance) and on a new concrete pad that would be approximately 36 feet by 36 feet (Figure 2); however, at one site which has an existing 200-foot tower, the new tower may also be 200 feet tall to accommodate the equipment to be installed on the new tower. The existing 200-foot tower does not support space for new equipment, and the spacing of existing equipment is not adequate. Line-of-sight microwave connectivity is also a consideration for the new tower height.

Monopole. New monopoles would generally be 70 feet tall (without appurtenance), although they could range up to 180 feet in height (without appurtenance). A typical monopole would be 6.5 feet in diameter, and installation would require drilling a 36-foot deep caisson. Monopoles would also be free-standing (Figure 3).

Equipment Shelter. New equipment shelters would be installed on a new concrete pad ranging in size from approximately 12 by 16 feet to 24 by 48 feet. Most equipment shelters would be single-story structures, although some sites may require two stories in order to house a generator.

Emergency Generator. Most LMR locations would require a new back-up generator. Generators would be installed on concrete pads ranging in size from 6 by 11 feet to 9 by 13 feet. The generators would include 1,000- to 1,500-gallon internal double walled tanks for diesel fuel.

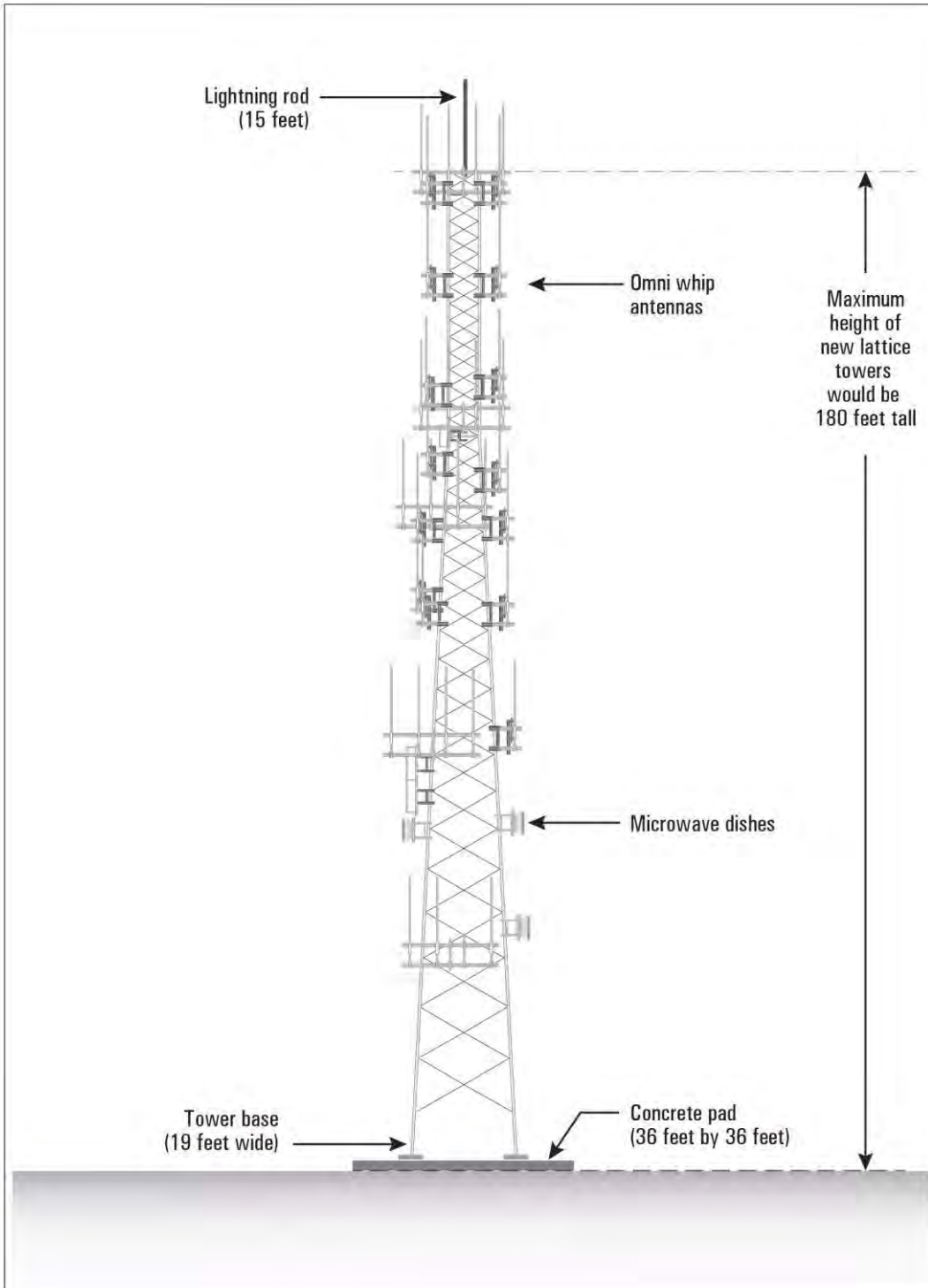


Figure 2. Typical Tower with Antennas

(Not to Scale)

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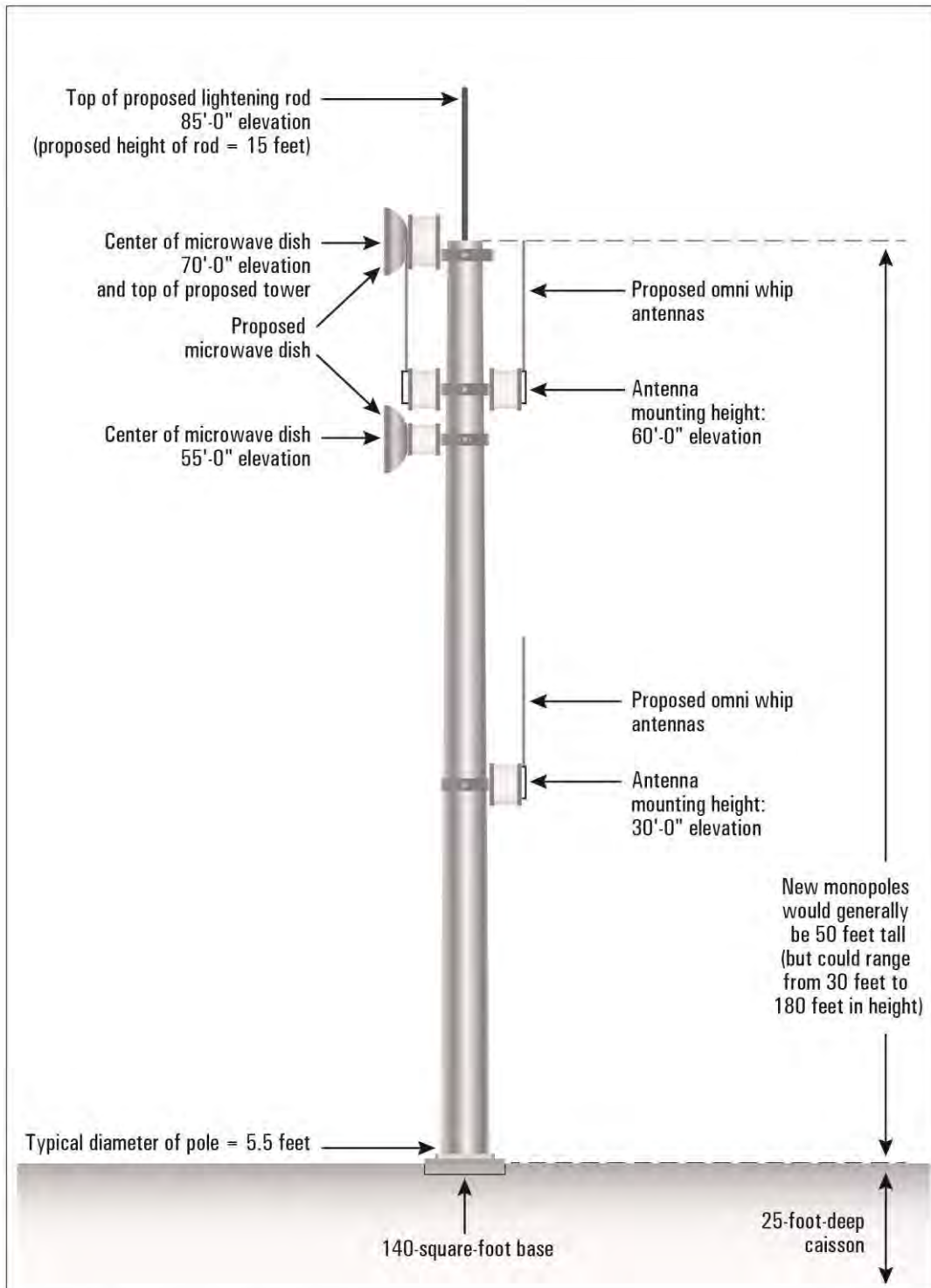


Figure 3. Typical Monopole with Antennas

(Not to Scale)

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All of the newly constructed structure foundations described above would be surrounded by an underground ground ring installed in a trench about 30 inches below grade. Although the facilities required at each LMR site would vary, most sites can generally be categorized into four general types. These are listed in Table 1.

Table 1 - General LMR Site Types and Features

LMR Site Types				
New Structures Required	New Lattice Tower with New Shelter	New Monopole with New Shelter	New Lattice Tower	New Equipment Shelter
Lattice Tower	X (generally 180' tall)	NA	X (generally 180' tall)	existing (height varies)
Monopole	NA	X (generally 70' tall)	NA	NA
Equipment Shelter	X	X	(existing)	X
Emergency Generator	X	X	X	X

NA - not applicable

Utilities

Electricity is available at all of the proposed LMR sites. Three sites not connected to an electrical utility line are solar powered. At all non-solar sites, new electrical lines would be installed in new underground conduit between the LMR facility and the nearest existing interconnection point. Underground electrical conduit would also be installed between new emergency generators and the equipment shelter. The amount of trenching required to install the conduit would vary at each site depending on the distance between the LMR facilities and the nearest point of interconnection. The maximum length of total trenching at any site is not expected to exceed 1,000 linear feet.

No other utility infrastructure would be installed as part of the proposed LMR project. The LMR sites would not require water or natural gas, and no wastewater would be generated.

Construction

Construction of the LMR sites is expected to begin in Summer 2015 and be completed in Fall 2016. Construction activity would occur for approximately six weeks at a site. Construction activities could occur at more than one site at a time.

Table 2 provides a summary of construction disturbance needed to construct a representative of each of the four general LMR site types.

Table 2 - Typical Construction Associated with the Four General LMR Site Types

	New Lattice Tower with New Shelter	New Monopole with New Shelter	New Lattice Tower	New Equipment Shelter
Grading	5-20 CY	5-10 CY	5-10 CY	10-30 CY
Temporary Disturbance (staging area)	1,000 SF	1,000 SF	1,800 SF	1,000 SF
Long-term Disturbance (includes structure foundations and conduits)	1,900 SF	2,000 SF	1,600 SF	600 SF
Foundations	Tower (6'x36'x36') pad & pier foundation	Monopole 6'-6" ft. Dia., 36 ft. Deep drilled caisson; caisson area 140 sf	Tower= 6'x36'x36' pad and pier foundation	Tower = NA
	Shelter= (12'x24') slab foundation with (24"x18") footing	Shelter= (12'x16') slab foundation with (18"x18") footing	Shelter = NA	Shelter = 12'x24' slab foundation with 18"X18" footings
	Generator = (8'-6"x11'-0"x9") slab foundation	Generator = (8'-6"x13'-6"x9") slab foundation	Generator = (9'-6"X13'-6"X9") slab foundation	Generator = 8'-6"x11'x9" slab foundation
Trenching for electrical and coaxial cable conduits	18" wide, 50 FT long trench from existing utility pole to meter (36" below grade)	18" wide, 180 FT long trench from transformer to meter (36" below grade)	18" wide, 30 FT long trench from generator to shelter. (36" below grade)	18" wide, 12 FT long trench from transformer to shelter (36" below grade).
	18" wide, 10 FT long trench from generator to shelter (24" below grade)	18" wide, 10 FT long trench from generator to shelter (36" below grade)		12" wide, 10 FT long trench from generator to shelter (24" below grade)
		24" wide, 70 FT long trench for coaxial from shelter to monopole (36" below grade)		
Trenching for grounding	30" below grade around perimeter of each new concrete pad (approx. 260 LF)	30" below grade around perimeter of each new concrete pad (approx. 145 LF)	30" below grade around perimeter of each concrete pad (approx. 200 LF)	30" below grade around perimeter of each new concrete pad (approx. 115 LF)
CY – cubic yards SF – square feet		FT – foot/feet LF – linear feet		NA – not applicable

Construction activities at each site would result in temporary disturbance of a maximum of approximately 5,000 square feet (0.11 acre). A maximum of approximately 2,000 square feet (0.05 acre) of new impermeable surface would be created at locations that require installation of new concrete pads for a tower, shelter, and generator.

Typical construction equipment required would include four-wheel drive vehicles, antenna and line trucks, water trucks, excavators, skidsters, cranes, forklifts, dump trucks, and concrete trucks. Almost all LMR facilities would be constructed within or adjacent to existing telecommunications or other facilities, such as water tanks, or at developed locations that currently have public radio service such as police and fire stations. At facilities such as urban police and fire stations, LMR construction may occur within paved or landscaped areas of the facility property.

Each site, with the exception of the sites that would be installed on buildings or some sites installed at urban police or fire stations, would be secured within a chain link fence. Where LMR sites would be collocated at existing telecommunication sites, construction of new facilities would occur within the existing fenced area of the facility to the maximum extent feasible. At some sites, an existing fenced area may need to be expanded or a new fenced area may be installed adjacent to the existing facility to allow construction of the LMR facilities. The total fenced area of the largest LMR sites would generally be less than 5,000 square feet.

System components would be staged and pre-installed at manufacturers' facilities and would be shipped and stored locally with the construction materials at a central location or multiple warehouses. At sites with limited laydown areas, all construction material would be shipped to each system site for just-in-time field installation with minimal field staging. If sufficient developed, landscaped, or previously disturbed areas exist on or adjacent to the LMR site, material could be staged at the site.

Each of the LMR sites would be accessed via existing paved or unpaved roads. No road improvements or new road construction is anticipated.

Operation

No staff would be required at any of the sites to operate the LMR equipment. The LMR facilities and equipment would need to be inspected, maintained, and repaired as necessary. Maintenance activities would involve both routine preventive maintenance and emergency procedure testing, including emergency generator testing, to maintain service continuity. Facilities and system components would be inspected annually, at a minimum, for corrosion, equipment misalignment, loose fittings, and other common mechanical problems. Maintenance activities may require use of bucket trucks (man-lifts), standard vans, or utility pickup trucks, depending on the scope of maintenance. Fuel tanks in the emergency generators would require occasional refilling. The LMR system components may need to be repaired or replaced to maintain uniform, adequate, safe, and reliable service. Equipment replacement or repair that cannot be diagnosed and performed remotely may require a technician on site, typically in a standard van or utility pickup truck. Where replacement or repair involves installed antennas, a four-person crew with one truck, a boom (aerial lift) truck, and an assist van sport utility vehicle (SUV) might be required.

The sites would have security lighting. Towers would have lighting and markings in compliance with Federal Aviation Administration (FAA) requirements, as applicable based on proposed structure height and location.

As part of site development and maintenance, vegetation on or immediately adjacent to an LMR site would be removed, as needed, in accordance with plans or procedures applicable to the site (i.e., jurisdictional requirements; type of infrastructure to be protected; and site factors including vegetation type, slope, and aspect).

9. **Surrounding land uses and setting:** The 120 LMR project sites being considered are located in varying settings ranging from urban to rural. Adjacent land uses include commercial, industrial, residential, recreational, and undeveloped areas. Most sites are adjacent to existing telecommunication facilities or other utility facilities,

such as municipal water tanks, or are at police, sheriff, and fire station facilities, hospitals, and county and local government buildings.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

- Federal Emergency Management Agency
- Federal Aviation Administration
- Federal Communications Commission
- National Park Service
- U. S. Army Corps of Engineers
- U. S. Bureau of Land Management
- U. S Coast Guard
- U. S. Forest Service
- U. S. Fish and Wildlife Service
- California Coastal Commission
- California Department of Fish and Wildlife
- California State Historic Preservation Officer
- Antelope Valley Air Quality Management District
- South Coast Air Quality Management District
- Lahontan Regional Water Quality Control Board
- Los Angeles Regional Water Quality Control Board
- Santa Ana Regional Water Quality Control Board
- Los Angeles County
- Orange County
- City of Agoura Hills
- City of Beverly Hills
- City of Burbank
- City of Carson
- City of Cerritos
- City of Chino Hills
- City of Claremont
- City of Compton
- City of El Monte
- City of El Segundo
- City of Glendale
- City of Glendora
- City of Huntington Park
- City of Inglewood
- City of Lancaster
- City of Los Angeles

- City of Malibu
- City of Palmdale
- City of Pasadena
- City of Rancho Palos Verdes
- City of Redondo Beach
- City of Rolling Hills
- City of San Dimas
- City of Santa Monica
- City of Signal Hill
- City of West Hollywood
- City of Westlake Village
- City of Whittier

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2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input checked="" type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology /Soils |
| <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology / Water Quality |
| <input checked="" type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input checked="" type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Utilities / Service Systems | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



 Signature

8-19-14

 Date

 Signature

 Date

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3 EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.



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4 ENVIRONMENTAL ISSUES

4.1 AESTHETICS

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Some LMR sites would include installation of new lattice towers or new monopoles that may be visible from scenic vistas and could result in significant visual impacts. Potentially significant impacts to scenic vistas will be evaluated in the EIR.
- b) The project area includes Los Angeles County and a small portion of adjacent Orange and San Bernardino counties (one potential site is in Orange County and two are in San Bernardino County). One designated state scenic highway traverses this area, State Route 2 in the Angeles National Forest, which is also a U.S. Forest Service (USFS) scenic byway. A number of eligible state scenic highways are in this area, and a few roads in the Santa Monica Mountains area are Los Angeles County designated scenic highways (Caltrans 2014). The proposed LMR towers may be visible from some of these scenic highways. Although none of the towers would be located where they would be expected to damage resources within a scenic highway, potentially significant impacts to scenic highways will be evaluated in the EIR.
- c) The project area encompasses the Wilderness areas within Angeles National Forest. Proposed LMR facilities near the Wilderness areas will be evaluated in the EIR for potential to be seen from Wilderness areas and the potential for the change to have an impact on the recreational experience because of the visibility of the facilities. Although all LMR sites are proposed at or adjacent to existing facilities, the presence of additional towers or monopoles or of new structures that may be taller or otherwise more visible than those currently present and could affect the existing visual character or quality at some locations. Potentially significant impacts to visual character and quality will be evaluated in the EIR.
- d) LMR facilities would require security lighting. Some towers may require lighting in accordance with Federal Aviation Administration requirements, depending on proposed tower height and locations. Glare from reflective surfaces may result from construction of some of the facilities. Potentially significant impacts from light and glare from LMR sites will be evaluated in the EIR.

4.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to nonforest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to nonforest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- None of the proposed LMR sites is located on an area mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program (FMMP 2010). No further analysis is warranted.
- None of the LMR sites are currently used for agricultural use or are under a Williamson Act contract. All of the LMR sites are either within or adjacent to existing telecommunications or other facilities and are not available for agricultural uses. No further analysis is warranted.
- None of the LMR sites are currently used for forestry use. All of the LMR sites, including those proposed for locations within the Angeles National Forest, are either within or adjacent to existing telecommunications or other facilities and are not available for forestry uses. No further analysis is warranted.
- None of the LMR sites are currently forest land. All of the LMR sites, including those proposed for locations within the Angeles National Forest, are either within or adjacent to existing telecommunications or other facilities and are not forest land. No further analysis is warranted.

- e) The purpose of the project is to enhance communications. The project would not involve any activities that would convert Farmland or forest land to other uses. No further analysis is warranted.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The majority of project sites would be located in the South Coast Air Basin (SCAB), within the South Coast Air Quality Management District (SCAQMD). Ten of the potential site locations are in the Mojave Desert Air Basin (MDAB) within the Antelope Valley Air Quality Management District (AVAQMD). The SCAB is designated a nonattainment area for the federal standards for ozone, particulate matter less than 2.5 microns in size (PM_{2.5}), and lead (Los Angeles County portion of SCAB only) and, for the State standards, for ozone, particulate matter less than 10 microns in size (PM₁₀), and PM_{2.5}. The Antelope Valley is designated a nonattainment area for the federal standard for ozone and for the State standards for ozone and PM₁₀. (CARB 2014).

Both districts have established standards for air pollutants generated by construction and by operational activities. During construction of the project, emissions may be generated by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment. Construction air emissions would be short-term and would be limited only to the time period when construction activity is taking place; however, an evaluation is needed to determine if air emissions would conflict with air quality plans. Potentially significant air quality impacts will be evaluated in the EIR.

- b) Both the SCAQMD and the AVAQMD have established standards for air pollutants generated by construction and by operational activities. During construction of the project, emissions may be generated by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment. Construction air emissions would be short-term and would be limited only to the time period when construction activity is taking place; however, an evaluation is needed to determine if air emissions would violate or contribute to existing air quality violations. Potentially significant air quality impacts will be evaluated in the EIR.

- c) Both the SCAQMD and the AVAQMD have established standards for air pollutants generated by construction and by operational activities. During construction of the project, emissions may be generated by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment. Construction air emissions would be short-term and would be limited only to the time period when construction activity is taking place; however, an evaluation is needed to determine if air emissions would be cumulatively considerable. Potentially significant air quality impacts will be evaluated in the EIR.
- d) Air emissions from construction of the LMR sites would be short-term (e.g., five to six weeks), and pollutant concentrations would be localized in the vicinity of the individual LMR construction site; however, some sites would be constructed adjacent to residential areas. Potentially significant impacts from pollutant concentrations from site construction will be evaluated in the EIR.
- e) Exhaust from construction vehicles and equipment may produce odors. These would be temporary and localized and would not affect a substantial number of people. Impacts would be less than significant; however, this will be evaluated in the EIR to confirm this expectation.

4.4 BIOLOGICAL RESOURCES

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Some LMR sites are located within or adjacent to areas that may provide suitable habitat for candidate, sensitive, or special status species, including areas designated as critical habitat under the federal Endangered Species Act. Potentially significant impacts to these species and their habitat will be evaluated in the EIR.
- b) Construction of the LMR sites may adversely affect riparian or other sensitive natural communities. Potentially significant impacts to the sensitive natural communities and wetlands will be evaluated in the EIR.
- c) Construction of the LMR sites may adversely affect wetlands. Potentially significant impacts to wetlands will be evaluated in the EIR.
- d) Some LMR sites would require creation of new fenced areas in locations that could be used by wildlife. Potentially significant impacts to fish and wildlife movement and use will be evaluated in the EIR.
- e) The EIR will evaluate whether conflicts with local policies and ordinances would result in significant impacts to biological resources.
- f) Some of the LMR sites are proposed for areas covered by Habitat Conservation Plans and Natural Community Conservation Plans. The project is not expected to conflict with these plans; however, the EIR will evaluate whether conflicts with such plans would result in significant impacts.

4.5 CULTURAL RESOURCES

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The proposed LMR sites would be located on sites throughout Los Angeles County, with one site potentially in Orange County and two sites potentially in San Bernardino County. Site locations may contain historic buildings and landmarks. While the project would be constructed mostly within existing communication facilities sites, construction and operation have the potential for both direct and indirect impacts to historical resources. Potentially significant impacts to historical resources will be evaluated in the EIR.
- b) Construction activities would require excavation for installation of tower or monopole and other facility foundations. Therefore, unknown archaeological resources have potential to be encountered during

project construction. Potentially significant impacts to archaeological resources will be evaluated in the EIR.

- c) Construction activities would require excavation for installation of tower or monopole and other facility foundations. Therefore unknown paleontological resources and/or unique geological features have potential to be encountered during project construction. Potentially significant impacts to paleontological resources and geologic features will be evaluated in the EIR.
- d) The project could result in the disturbance of unknown human remains due to anticipated grading and excavation activities, including those outside formal cemeteries. The potential for impacts to human remains will be evaluated in the EIR.

4.6 GEOLOGY AND SOILS

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Some of the proposed LMR sites would be located within Alquist-Priolo Earthquake Fault Zones (CDC-CGS 2009). Given the location of the project in the southern California region, the entire project area is subject to the effects of seismic activity. An evaluation of earthquake fault, seismic, and landslide hazards at the LMR sites will be provided in the EIR.

- b) Ground-disturbing activities would occur during construction of the project from activities such as installing concrete foundations for site structures, trenching for utility connections, and installing fences at some sites. Total ground disturbance at each site would not exceed an acre. Standard soil erosion control measures would be implemented during construction. The maximum disturbance area at any site would not exceed approximately 5,000 square feet, and construction activity at a site would typically be completed in five to six weeks. Based on the limited construction area size, the short duration of construction activity, and the implementation of soil erosion control measures, substantial soil erosion and loss of topsoil is not expected. Potentially significant impacts from soil erosion will be evaluated in the EIR.
- c) Prior to any construction and as a standard practice, a geotechnical evaluation would be prepared which would prescribe methods, techniques, and specifications for: site preparation, treatment of undocumented fill and/or alluvial soils, fill placement on sloping ground, fill characteristics, fill placement and compactions, temporary excavations and shoring, permanent slopes, treatment of expansive soils, and treatment of corrosive soils. Design and construction of the project would conform to recommendations in the geotechnical evaluation. Potentially significant impacts from unstable soil or geologic units will be evaluated in the EIR.
- d) Prior to any construction and as a standard practice, a geotechnical evaluation would be prepared which would prescribe methods, techniques, and specifications for: site preparation, treatment of undocumented fill and/or alluvial soils, fill placement on sloping ground, fill characteristics, fill placement and compactions, temporary excavations and shoring, permanent slopes, treatment of expansive soils, and treatment of corrosive soils. Design and construction of the project would conform to recommendations in the geotechnical evaluation. Potentially significant impacts from expansive soil will be evaluated in the EIR.
- e) The project would not include the installation or use of septic tanks or other wastewater disposal systems; therefore, soil suitability to support such systems is not relevant to this project. No further analysis is warranted.

4.7 GREENHOUSE GAS EMISSIONS

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION:

- a) Greenhouse gas (GHG) emissions may be generated during construction by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment. Operation would also result in an increase in electrical usage, which would generate GHG emissions. An evaluation based on SCAQMD and AVAQMD significance thresholds for greenhouse gas emission is needed to determine if project-related emissions are potentially significant. This will be evaluated further in the EIR.

- b) GHG emissions may be generated during construction by grading activities, construction workers traveling to and from the project site, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment. Operation would also result in an increase in electrical usage, which would generate GHG emissions. An evaluation for greenhouse gas emission is needed to determine if project-related emissions would conflict with any applicable plans, policies, or regulations. This will be evaluated further in the EIR.

4.8 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Construction of the project would require the use of gasoline, diesel fuel, oil, solvents, and lubricants associated with vehicles and construction activities. Operation of the project would require routine testing of the diesel-powered emergency generator that would be installed at most LMR sites. The

internal storage tank would be double-walled and would contain a maximum of 1,500 gallons of diesel fuel. The potential to affect human health and safety from the transport, use, or disposal of hazardous substances during construction or operations will be evaluated in the EIR.

- b) Construction of the project would require the use of gasoline, diesel fuel, oil, solvents, and lubricants associated with vehicles and construction activities. Releases of these substances could occur during construction. Operation of the project would require routine testing of the diesel-powered emergency generator that would be installed at most LMR sites. The internal storage tank would be double-walled and would contain a maximum of 1,500 gallons of diesel fuel. In the unlikely event of an accident during the transport of diesel fuel or refueling the generator tank that resulted in a release of product, emergency procedures would include notification of appropriate authorities; containment of the spilled product; and clean-up of the spill to federal, State, and local standards. The potential to affect human health and safety from a release of hazardous substances during construction or operations as the result of accident will be evaluated in the EIR.
- c) Some proposed LMR sites are located within one-quarter mile of schools. Because most sites would include installation of a diesel-powered emergency generator, diesel fuel storage may occur within one-quarter mile of schools. The use of diesel fuel in a generator within one-quarter mile of a school is not expected to have a potentially significant impact because of the limited amount of diesel fuel that would be present inside a storage tank at any site (maximum 1,500 gallons) and because fuel tanks would be monitored with a leak detection and alarm system; however, this will be evaluated in the EIR to confirm this expectation.
- d) A review of the LMR sites and hazardous material sites will be conducted, and potentially significant impacts will be evaluated in the EIR.
- e) Some LMR sites would be located within the vicinity of airports. Potentially significant impacts related to hazards from individual sites located within airport land use plans or within 2 miles of a public or public use airport will be evaluated in the EIR.
- f) Some LMR sites would be located within the vicinity of private airstrips. Potentially significant impacts related to hazards from individual sites located within the vicinity of a private airstrip will be evaluated in the EIR.
- g) The project would improve communications to allow for better coordination of emergency response action or evacuation plans. Temporary road or lane closures could be required at or near some LMR sites during construction activities. Any temporary roadway or lane closure would be coordinated with local jurisdictions to minimize potential impacts to emergency access and evacuation routes. No significant impacts would occur; however, this will be evaluated in the EIR to confirm this expectation.
- h) LMR sites not proposed for urban areas may be in areas subject to wildland fires. Potentially significant impacts from wildland fires will be evaluated in the EIR.

4.9 HYDROLOGY AND WATER QUALITY

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Project operations would not produce any wastewater. If shallow groundwater is encountered during excavation for foundations or drilling for monopole installation, dewatering may be necessary. Any water produced by dewatering activities during construction would be disposed of in accordance with applicable regulations. Impacts are anticipated to be less than significant; however, this will be evaluated in the EIR to confirm this expectation.

- b) Construction of the proposed LMR sites would result in the creation of new impermeable surfaces at some sites; however, each LMR site is relatively small (maximum of 5,000 square feet total) and would not be expected to substantially interfere with groundwater recharge at any site. Project operations would not require use of water. During construction of the proposed LMR sites, water for dust control and concrete mixing would be obtained from existing municipal sources (e.g., fire hydrants). Water from these sources may come at least partially from local groundwater supplies. Impacts on water supplies from water usage by the project will be evaluated in the EIR.
- c) The project would not result in alteration of a stream or river. The project may require grading at some sites and the addition of impermeable surfaces that may increase stormwater runoff. Best management practices to control soil erosion and stormwater runoff would be implemented during construction, and erosion controls would be incorporated into site design. Although each LMR site would not exceed 5,000 square feet, and changes in site topography and stormwater runoff would not be expected to result in substantial erosion or siltation, potential erosion impacts will be evaluated in the EIR to confirm this expectation.
- d) The project would not result in alteration of a stream or river. The project may require grading at some sites and the addition of impermeable surfaces that may increase stormwater runoff. Best management practices to control soil erosion and stormwater runoff would be implemented during construction, and erosion controls would be incorporated into site design. Although each LMR site would not exceed 5,000 square feet, and changes in site topography and stormwater runoff would not be expected to result in substantial flooding, potential flooding impacts will be evaluated in the EIR to confirm this expectation.
- e) The size of each LMR site would not exceed 5,000 square feet, and the increase in impermeable surface area at any LMR site would not exceed 2,000 square feet. A significant increase in surface water runoff would not be expected. Potential sources of polluted surface water runoff would be limited to leaks or spills associated with construction equipment operations and from leaks of diesel fuel from the emergency generator, particularly when the generator is serviced or refueled. Standard accidental release responses that would be implemented during construction would minimize potential impacts from construction equipment usage. The storage tank in the emergency generator would be double-walled to provide secondary containment and minimize the potential for fuel being released that could pollute stormwater runoff. The potential to affect water quality from a fuel leak or spill during service or refueling will be evaluated in the EIR.
- f) Diesel-powered emergency generators would be required at most LMR sites. The generators would include internal tanks containing 1,000 to 1,500 gallons of diesel fuel. The tank would be double-walled, providing secondary containment for tank leaks. The potential to affect water quality from a fuel leak or spill during service or refueling will be evaluated in the EIR.
- g) The project does not include the construction of any housing and therefore would not result in placing housing in a flood hazard area. No further analysis is warranted.
- h) At least one proposed LMR site is located within a 100-year flood zone (FEMA 2014). Potentially significant impacts to LMR structures within a 100 year flood hazard area will be evaluated in the EIR.
- i) At least one proposed LMR site is located within a 100-year flood zone (FEMA 2014). Potentially significant impacts from damage due to flooding at the proposed LMR sites will be evaluated in the EIR.
- j) Some LMR sites would be located near the coast and therefore could be in locations potentially affected by a tsunami. Potentially significant impacts from seiches, tsunamis, or mudflows at the proposed LMR sites will be evaluated in the EIR.

4.10 LAND USE AND PLANNING

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The proposed project is the construction and operation of communications sites. These sites would not be physically connected in any way that has the potential to physically divide any community. No further analysis is warranted.
- b) The proposed LMR sites would be located in areas with a variety of existing land uses and within the jurisdiction of a number of agencies that regulate land use including Los Angeles County, multiple cities, USFS, the federal Bureau of Land Management, and the California Coastal Commission. Potentially significant impacts related to changes in land use and consistency with existing land use policies and zoning at each LMR site will be further addressed in the EIR.
- c) Portions of the project sites are located within the boundaries of habitat conservation plans and natural community conservation plans. Consistency of the proposed sites that would be located in areas subject to these plans will be evaluated in the EIR.

4.11 MINERAL RESOURCES

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) None of the proposed LMR sites is currently being used for mineral resource extraction. All the proposed sites contain existing facilities and structures whose presence precludes use of the area for mineral resource extraction; and, therefore, mineral resources are not available at these sites. Proposed LMR facilities would be constructed at or adjacent to these existing facilities and structures; therefore, the project would not result in a change in site conditions that would affect mineral resource availability. No further analysis is warranted.
- b) None of the proposed LMR sites is currently being used for mineral resource extraction. All the proposed sites contain existing facilities and structures whose presence precludes use of the area for mineral resource extraction; and, therefore, mineral resources are not available at these sites. Proposed LMR facilities would be constructed at or adjacent to these existing facilities and structures; therefore, the project would not result in a change in site conditions that would affect availability of locally important mineral resource recovery sites. No further analysis is warranted.

4.12 NOISE

Would the project result in:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Noise levels in the vicinity of the project would increase during the construction phase of the project. Most city noise ordinances exempt construction activities during daytime hours, and some allow such activities to occur during nighttime hours; however, construction activities generally must comply with noise level restrictions during specified daytime and/or nighttime hours. Noise impacts could be potentially significant, but mostly a person's sensitivity to noise increases during nighttime hours. People

are generally less sensitive to noise during daytime hours when moderate to high noise levels generally dominate ambient conditions. Construction activities at each site would be designed to comply as much as possible with the applicable noise ordinances that limit the hours and/or noise levels during which construction activities may occur. Potentially significant noise impacts will be analyzed in the EIR.

- b) Construction of the project may generate ground-borne vibrations or ground-borne noise. This will be analyzed in the EIR.
- c) Construction activities may temporarily increase noise levels in the vicinity of the project (see item XII-d below), but increases would be short-term (five to six weeks). Operation of the project would not include any activities or equipment usage that would result in a permanent increase in noise levels in the vicinity of a project site. Impacts would be less than significant. No further analysis is warranted.
- d) Operation of construction equipment at the proposed LMR sites may produce a temporary increase in noise levels in the vicinity of a site. The emergency generator that would be present at most LMR sites would be operated periodically as part of routine maintenance testing, which could produce a temporary noise increase. This will be analyzed in the EIR.
- e) Some LMR sites may be located within airport land use zones or within 2 miles of a public airport or public use airport. An evaluation of which sites are located near a public airport and the potential noise impacts at these sites will be analyzed in the EIR.
- f) Some LMR sites may be located within the vicinity of a private airport. An evaluation of which sites are located near a private airport and the potential noise impacts at these sites will be analyzed in the EIR.

4.13 POPULATION AND HOUSING

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The project would involve the construction and operation of an LMR system that is intended to improve and facilitate communications among emergency responders. While its intent is to improve public safety, it would not increase employment or housing; and it would not provide infrastructure that could induce population growth. Construction of the facilities would result in a short-term increase in construction employment that would be spread throughout Los Angeles County and adjacent areas. The increase in construction employment would not be expected to induce substantial population growth in the area because the work force would be small enough to be accommodated by persons already living in the area. No further analysis is warranted.

- b) The construction and operation of the LMR system would not displace any existing housing. No further analysis is warranted.
- c) The construction and operation of the LMR system would not displace any people. No further analysis is warranted.

4.14 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The purpose of the project is to facilitate communications among emergency response agencies including fire, police, and hospitals. Many LMR sites would be constructed at fire stations, police stations, and other public facilities such as hospitals. The project would not result in the need for additional fire and police facilities, would not increase school populations and the need for additional school facilities, would not affect development or use of parks, or result in any other significant impacts to other public facilities. No further analysis is warranted.

4.15 RECREATION

	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) The project would not cause a direct population increase (see Section XII above). The construction and operation of the LMR system would have no effect on the use of existing neighborhood parks or regional parks or recreational facilities. Therefore, the project would not result in substantial physical deterioration of recreational facilities. Because some LMR sites would be located in or adjacent to existing recreational facilities, impacts to recreation will be analyzed in the EIR.
- b) The project does not include or require construction or expansion of any recreational facilities. No further analysis is warranted.

4.16 TRANSPORTATION/TRAFFIC

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

- a) Construction of the project, including workers' vehicles and construction equipment, would temporarily increase traffic in the vicinity of the proposed LMR sites. Potential impacts to transportation during construction of the project will be evaluated in the EIR.
- b) Construction of the project, including workers' vehicles and construction equipment, would temporarily increase traffic in the vicinity of the proposed LMR sites. Potential impacts to congestion management programs during construction of the project will be evaluated in the EIR.
- c) The project includes the construction of antenna support structures up to 180 feet tall without appurtenances at some locations where structures of this height do not currently exist. Potentially significant impacts to aircraft traffic patterns will be evaluated in the EIR.
- d) The proposed LMR sites would be accessed using existing roads and related infrastructure such as parking lots. The project would not entail any changes to transportation system designs and, therefore, would not introduce any design feature hazards or incompatible uses. No further analysis is warranted.
- e) Temporary road or lane closures could be required at some LMR sites during construction activities. Any temporary roadway or lane closure would be coordinated with local jurisdictions to minimize potential impacts to emergency access and evacuation routes. No significant impacts would be expected; however, potential impacts to emergency access and evacuation routes will be evaluated in the EIR to confirm this expectation.

The LMR facilities would not be sited where they could affect emergency access. During the design process, siting of the LMR facilities would be discussed with the property owner and operator to ensure existing operations and emergency access are not affected and access to existing facilities would not be blocked, as is required in the site lease/access agreement with the property owner. The LMR system contract requires compliance with applicable regulations and codes, including Life and Safety codes that contain requirements on emergency access. By incorporating code requirements in the placement and design of LMR facilities, operation of the project would have no impact on emergency access.

- f) The project consists of the construction and operation of telecommunication sites. None of the sites would be constructed where public transit, bicycle, or pedestrian facilities are located. The project would have no effect on any policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities nor would it decrease the performance or safety of these facilities. No further analysis is warranted.

4.17 UTILITIES AND SERVICE SYSTEMS

Would the project:	Less Than Significant with			
	Potentially Significant Impact	Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) During excavation activities, dewatering may be necessary. Discharge of any water would follow the Regional Water Quality Control Board (RWQCB) requirements. Construction of the project would not involve discharging concentrated wastewater or large volumes of wastewater to a wastewater treatment facility that would exceed treatment requirements set forth by the RWQCB. As a result, a less than significant impact on requirements of the wastewater treatment plants in the project area is anticipated during construction of the project. During operations, the project would not result in the production of any wastewater that would require treatment. Although less than significant impacts are expected, impacts from wastewater discharge will be evaluated in the EIR to confirm this expectation.
- b) The project would not include construction or expansion of any water or wastewater treatment facilities. Therefore, no impact would occur to these types of facilities, and no further analysis is warranted.
- c) The project may require grading at some sites and the addition of impermeable surfaces that may increase stormwater runoff. Although each LMR site is relatively small (would not generally exceed 5,000 square feet) and changes in site topography and stormwater runoff would not be expected to require major changes in existing stormwater drainage facilities or extensive new stormwater drainage facilities, impacts from stormwater runoff facilities will be evaluated in the EIR.

- d) Water would be required during construction of the LMR sites for activities such as concrete mixing and dust suppression. No water would be required for routine operation of the sites. Water usage for construction and operation are expected to be minor; however, impact of the project's water requirements and water supplies will be evaluated in the EIR to confirm this expectation.
- e) The project would not result in generation of wastewater requiring treatment. No further analysis is required.
- f) Construction of the project would not generally entail demolition of existing structures that would generate waste requiring disposal. At some sites, existing chain link fencing may be removed to expand a fenced area. Small amounts of debris may be created as a routine part of constructing new facilities. Operation of the project would result in minimal or no solid waste on a routine basis. Although quantities of solid waste are expected to be small, an evaluation of solid waste generation and the capacity of landfills in the project area to accept that waste will be provided in the EIR.
- g) The amounts and types of waste that may be generated by construction of the project, as described under XVII f), would not conflict with solid waste regulations and statutes. Operation of the project would generate minimal solid waste; however, impacts to solid waste generation will be included in the EIR.

4.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) Potentially significant impacts that require evaluation in an EIR have been identified for several resources in this Initial Study. Surveys will be conducted to identify biological, archaeological, and cultural resources at and in the vicinity of the project sites to identify resources that may be affected by construction and operation of the project. This issue will be carried forward for analysis.

- b) The project has the potential to result in environmental impacts during construction and operation in several resource categories. In addition, other related projects in the vicinity of the LMR sites may also result in environmental impacts. As such, the project, combined with other projects in the area, has potential to result in a significant cumulative impact. Therefore, the proposed project's contribution to any significant cumulative impact will be analyzed further in the EIR.
- c) Implementation of the project would involve mostly construction impacts. After construction, operational impacts from the project could occur. This topic will be analyzed further in the EIR.

5 REFERENCES

- California Air Resource Board (CARB). 2014. Area Designations Maps / State and National. Retrieved from <http://www.arb.ca.gov/desig/adm/adm.htm>.
- California Department of Conservation, California Geological Survey (CDC-CGS). 2009. Alquist-Priolo Surface Faults. Retrieved from http://atlas.resources.ca.gov/ArcGIS/rest/services/GeoScience/HazardMaps_09_01_2009_Seismic/MapServer/1.
- California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). 2010. Retrieved from <http://www.conservation.ca.gov/dlrp/fmmp/products/Pages/DownloadGISdata.aspx>.
- California Department of Transportation (Caltrans). 2014. California Scenic Highway Mapping System, Officially Designated State Scenic Highways and Historic Parkways. Retrieved from http://www.dot.ca.gov/hq/LandArch/scenic_highways/.
- Federal Emergency Management Agency (FEMA). 1998. Flood Insurance Rate Maps for Los Angeles, Orange, and San Bernardino Counties. Retrieved from <http://gisdata.scag.ca.gov/Pages/GIS-Library.aspx>.

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**APPENDIX A-1 –
POTENTIAL LMR SITE LOCATIONS**

For Copy of the proposed LMR Site List, please contact
Marina Nguyen at Marina.Nguyen@jacobs.com

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APPENDIX A-3

NOTICE OF COMPLETION AND DISTRIBUTION LIST

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Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Los Angeles Regional Interoperable Communications System (LA-RICS) Land Mobile Radio (LMR) System

Lead Agency: LA-RICS Joint Powers Authority (JPA) Contact Person: Nancy Yang
Mailing Address: 2525 Corporate Place, Suite 200 Phone: 323.881-8049
City: Monterey Park Zip: 91754 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: sites are located countywide

Cross Streets: Zip Code:

Longitude/Latitude (degrees, minutes and seconds): Total Acres:

Assessor's Parcel No.: Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: Waterways:

Airports: Railways: Schools:

Document Type:

- CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other: Initial Study [] FONSI

Local Action Type:

- [] General Plan Update [] Specific Plan [] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc.) [X] Other: telecommunications

Development Type:

- [] Residential: Units Acres
[] Office: Sq.ft. Acres Employees Transportation: Type
[] Commercial: Sq.ft. Acres Employees Mining: Mineral
[] Industrial: Sq.ft. Acres Employees Power: Type MW
[] Educational: Waste Treatment: Type MGD
[] Recreational: Hazardous Waste: Type
[] Water Facilities: Type MGD [X] Other: telecommunications sites

Project Issues Discussed in Document:

- [X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [X] Soil Erosion/Compaction/Grading [] Growth Inducement
[X] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [] Cumulative Effects
[] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

varies; multiple sites in multiple jurisdictions

Project Description: (please use a separate page if necessary)

Installation and operation of up to 90 LMR communications sites in Los Angeles County and portions of adjacent Orange and San Bernardino counties to provide voice communications coverage for emergency responders. The proposed sites are within or adjacent to existing communication facilities to the maximum extent feasible. The project consist of installation of antennas on existing and new lattice towers and monopoles and supporting radio equipment in existing and new shelters. Sites may also include new emergency generators. New lattice towers would generally not exceed 180 feet in height. New monopoles would generally be 70 feet tall. Maximum construction footprints would not exceed 5,000 square feet at a site.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
 If you have already sent your document to the agency please denote that with an "S".

- Air Resources Board
- Boating & Waterways, Department of
- California Emergency Management Agency
- California Highway Patrol
- Caltrans District # 7
- Caltrans Division of Aeronautics
- Caltrans Planning
- Central Valley Flood Protection Board
- Coachella Valley Mtns. Conservancy
- Coastal Commission
- Colorado River Board
- Conservation, Department of
- Corrections, Department of
- Delta Protection Commission
- Education, Department of
- Energy Commission
- Fish & Game Region # 5, 6
- Food & Agriculture, Department of
- Forestry and Fire Protection, Department of
- General Services, Department of
- Health Services, Department of
- Housing & Community Development
- Native American Heritage Commission

- Office of Historic Preservation
- Office of Public School Construction
- Parks & Recreation, Department of
- Pesticide Regulation, Department of
- Public Utilities Commission
- Regional WQCB # 4, 6V, 8
- Resources Agency
- Resources Recycling and Recovery, Department of
- S.F. Bay Conservation & Development Comm.
- San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
- San Joaquin River Conservancy
- Santa Monica Mtns. Conservancy
- State Lands Commission
- SWRCB: Clean Water Grants
- SWRCB: Water Quality
- SWRCB: Water Rights
- Tahoe Regional Planning Agency
- Toxic Substances Control, Department of
- Water Resources, Department of
- Other: _____
- Other: _____

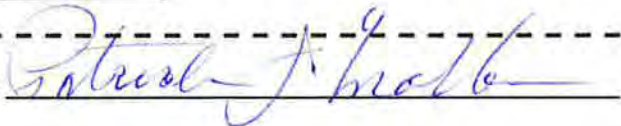
Local Public Review Period (to be filled in by lead agency)

Starting Date August 27, 2014 Ending Date September 25, 2014

Lead Agency (Complete if applicable):

Consulting Firm: Jacobs
 Address: 3257 E Guasti Road, Suite 120
 City/State/Zip: Ontario, CA 91761
 Contact: Carl Rykaczewski
 Phone: 909.974.2721

Applicant: LA-RICS JPA
 Address: 2525 Corporate Place, Suite 200
 City/State/Zip: Monterey Park, CA 91754
 Phone: 323.881.8049

Signature of Lead Agency Representative:  Date: 8-19-14

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Agency Name	Salutation	Contact	Title	Address	Address 2	City	State	Zip
Federal Aviation Administration			Western-Pacific Region	Property Management Branch, AWP 54B	PO Box 92007	Los Angeles	CA	90009
U.S. Forest Service	Mr.	Justin Seastrand	Forest Environmental Coordinator	U.S. Department of Agriculture, Forest Service Angeles National Forest	701 N. Santa Anita Ave.	Arcadia	CA	91006-7725
Santa Monica Mountains National Recreation Area	Ms.	Melanie Beck	Outdoor Recreation Planner	401 West Hillcrest Dr.		Thousand Oaks	CA	91360
U.S. Army Corps of Engineers	Ms.	Katie Parks		Asset Management Division, Department of the Army, Los Angeles District, Corps of Engineers	915 Wilshire Blvd.	Los Angeles	CA	90017
U.S. Bureau of Land Management	Mr.	Paul Rodriguez	Realty Specialist	Bureau of Land Management, Ridgecrest Field Office	300 S. Richmond Rd.	Ridgecrest	CA	93555
U.S. Coast Guard				Commander(s) Maintenance and Logistic Command	Pacific Coast Guard Island Building 54D	Alameda	CA	94501-5100
U.S. Fish and Wildlife Service	Mr.	Scott Sobiech	Deputy Field Supervisor	Carlsbad Fish & Wildlife Office	2177 Salk Ave., Suite 250	Carlsbad	CA	92008
U.S. Fish and Wildlife Service	Mr.	Steve Henry	Field Supervisor	Ventura Fish and Wildlife Office	2493 Portola Rd., Suite B	Ventura	CA	93003-7726
U.S. Fish and Wildlife Service	Mr.	Ken Corey	Assistant Field Supervisor	Palm Springs Fish & Wildlife Office	777 E. Tahquitz Canyon Way, Suite 208	Palm Springs	CA	92262
California Coastal Commission				South Central Coast District	89 S. California St., #200	Ventura	CA	93001
California Coastal Commission				South Coast District	200 Oceangate	Long Beach	CA	90802
California Department of Fish and Wildlife, Region V	Mr.	Ed Pert	Regional Manager	3883 Ruffin Road		San Diego	CA	92123
California Department of Fish and Wildlife, Region VI	Ms.	Kimberly Nicol	Regional Manager	3602 Inland Empire Blvd., Suite C-220		Ontario	CA	91764
California State Historic Preservation Officer	Dr.	Carol Roland-Nawi, Ph.D	State Historic Preservation Officer	1725 23rd St., Suite 100		Sacramento	CA	95816
Antelope Valley Air Quality Management District	Mr.	Eldon Heaston	Executive Director	43301 Division St., Suite 206		Lancaster	CA	93535
South Coast Air Quality Management District	Dr.	Barry R. Wallerstein, D.Env	Executive Officer		21865 Copley Dr.	Diamond Bar	CA	91765
Lahontan Regional Water Quality Control Board, Region 6	Ms.	Patty Z. Kouyoumdijan	Executive Officer	2501 Lake Tahoe Blvd.		South Lake Tahoe	CA	96150
Los Angeles Regional Water Quality Control Board, Region 4	Mr.	Samuel Unger	Executive Officer	320 W. Fourth St., Suite 200		Los Angeles	CA	90013
Santa Ana Regional Water Quality Control Board, Region 8			Executive Officer	3737 Main St., Suite 500		Riverside	CA	92501
Southern California Association of Governments, Transportation Planning	Mr.	Rich Macias	Director		818 W. Seventh St., 12th Floor	Los Angeles	CA	90017
Caltrans, District 7	Ms.	Carrie Bowen	District Director	Caltrans - District 7	100 S. Main St.	Los Angeles	CA	90012
California State Parks	Ms.	Lisa Mangat	Acting Director	1416 9th St.		Sacramento	CA	95814
Native American Heritage Commission	Ms.	Cynthia Gomez	Executive Secretary	1550 Harbor Blvd., Suite 100		West Sacramento	CA	95691
Los Angeles County	Mr.	William T Fujioka	Chief Executive Officer	Kenneth Hahn Hall of Administration	500 W. Temple St.	Los Angeles	CA	90012
Los Angeles County	Mr.	Sean Rogan	Executive Director	Community Development Commission/Housing Authority of the County of Los Angeles	700 W. Main St.	Alhambra	CA	91801
Orange County	Mr.	Michael B. Giancola	Chief Executive Officer	333 W. Santa Ana Blvd.		Santa Ana	CA	92701
Orange County		Executive Director		Community Development Department	300 N. Flower St.	Santa Ana	CA	92703
City of Agoura Hills	Mr.	Greg Ramirez	City Manager	30001 Ladyface Ct.		Agoura Hills	CA	91301

Agency Name	Salutation	Contact	Title	Address	Address 2	City	State	Zip
City of Agoura Hills	Mr.	Mike Kamino	Director	Planning and Community Development Department	30001 Ladyface Ct.	Agoura Hills	CA	91301
City of Beverly Hills	Mr.	Jeffrey Kolin	City Manager	455 N. Rexford Dr.		Beverly Hills	CA	90210
City of Beverly Hills	Ms.	Susan Healy Keene, AICP	Director	Community Development Department	455 N. Rexford Dr., 1st Fl.	Beverly Hills	CA	90210
City of Burbank	Mr.	Mark Scott	City Manager	Office of the City Manager, City Hall	275 E. Olive Ave.	Burbank	CA	91510
City of Burbank	Ms.	Joy Forbes	Director	Community Services Bldg., 2nd Fl.	150 North Third Street	Burbank	CA	91502
City of Carson	Ms.	Jackie Acosta	Acting City Manager	City Hall	701 E. Carson St.	Carson	CA	90745
City of Carson		Executive Director		Community Development	701 E. Carson St.	Carson	CA	90745
City of Cerritos	Mr.	Art Gallucci	City Manager		18125 Bloomfield Ave.	Cerritos	CA	90703
City of Cerritos		Director		Community Development Department	18125 Bloomfield Ave.	Cerritos	CA	90703
City of Chino Hills	Mr.	Konradt Bartlam	City Manager	14000 City Center Dr.		Chino Hills	CA	91709
City of Chino Hills		Director		Community Development Department	14000 City Center Dr.	Chino Hills	CA	91709
City of Claremont	Mr.	Tony Ramos	City Manager	207 Harvard Ave.		Claremont	CA	91711
City of Claremont	Mr.	Brian Desatnik	Director	Community Development Department	207 Harvard Ave.	Claremont	CA	91711
City of Compton	Mr.	G. Harold Duffey	City Manager	205 S. Willowbrook Ave.		Compton	CA	90220
City of Compton		Director		Planning and Economic Development Department	205 S. Willowbrook Ave.	Compton	CA	90220
City of El Monte	Mr.	Raul Godinez	City Manager	City Hall East	11333 Valley Blvd.	El Monte	CA	91731
City of El Monte		Planning Director		City Hall West	11333 Valley Blvd.	El Monte	CA	91731
City of El Segundo	Mr.	Greg Carpenter	City Manager	Office of the City Manager	350 Main St.	El Segundo	CA	90245
City of El Segundo		Director		Planning and Building Safety Department	350 Main St.	El Segundo	CA	90245
City of Glendale	Mr.	Scott Ochoa	City Manager	Management Services	613 E. Broadway, Room 200	Glendale	CA	91206
City of Glendale	Mr.	Hassan Haghani	Director	Community Development Department	613 E. Broadway	Glendale	CA	91206
City of Glendora	Mr.	Chris Jeffers	City Manager	City of Glendora	116 E. Foothill Blvd.	Glendora	CA	91741
City of Glendora	Mr.	Jeff Kugel	Director of Planning	Planning Department	116 E. Foothill Blvd.	Glendora	CA	91741
City of Huntington Park	Mr.	Julio Morales	Interim City Manager	6550 Miles Ave.		Huntington Park	CA	90255
City of Huntington Park		Director		Community Development Department	6550 Miles Ave.	Huntington Park	CA	90255
City of Inglewood	Mr.	Artie Fields	City Manager	One Manchester Blvd.		Inglewood	CA	90301
City of Inglewood	Ms.	Linda F. Tatum, AICP	Acting Community Development Director	Economic & Community Development Department	One Manchester Blvd.	Inglewood	CA	90301
City of Lancaster	Mr.	Mark V. Bozigian	City Manager	44933 Fern Ave.		Lancaster	CA	93534
City of Lancaster		Planning Director		44933 Fern Ave.		Lancaster	CA	93534
City of Los Angeles	Mr.	Miguel Santana	City Administrative Officer	200 N. Main St., Suite 1500		Los Angeles	CA	90012
City of Los Angeles	Mr.	Michael LoGrande	Director of Planning	Department of City Planning	200 N. Spring St.	Los Angeles	CA	90012
City of Los Angeles, Department of Transportation	Ms.	Seleta Reynolds	General Manager	City of Los Angeles, Department of Transportation	100 S. Main St., 10th Floor	Los Angeles	CA	90012
City of Malibu	Mr.	Jim Thorsen	City Manager	23825 Stuart Ranch Rd.		Malibu	CA	90265
City of Malibu	Ms.	Joyce Parker-Bozylinski	Planning Director	23825 Stuart Ranch Rd.		Malibu	CA	90265
City of Palmdale	Mr.	David Childs	City Manager	38300 Sierra Highway, Suite A		Palmdale	CA	93550
City of Palmdale		Planning Director		38250 Sierra Highway		Palmdale	CA	93350

Agency Name	Salutation	Contact	Title	Address	Address 2	City	State	Zip
City of Pasadena	Mr.	Michael J. Beck	City Manager	100 N. Garfield Ave., Room S228		Pasadena	CA	91109
City of Pasadena	Mr.	Vincent P. Bertoni, AICP	Director of Planning and Community Development	175 N. Garfield Ave.		Pasadena	CA	91101
City of Rancho Palos Verdes	Ms.	Carolynn Petru	Acting City Manager	Rancho Palos Verdes City Hall	30940 Hawthorne Blvd.	Rancho Palos Verdes	CA	90275
City of Rancho Palos Verdes	Mr.	Joel Rojas	Director of Community Development	Rancho Palos Verdes City Hall	30940 Hawthorne Blvd.	Rancho Palos Verdes	CA	90275
City of Redondo Beach	Mr.	Joe Hoefgen	Interim City Manager	City Manager's Office	415 Diamond St.	Redondo Beach	CA	90277
City of Redondo Beach		Planning Director		415 Diamond St.		Redondo Beach	CA	90277
City of Rolling Hills	Mr.	Raymond R. Cruz	City Manager	Two Portuguese Bend Rd.		Rolling Hills	CA	90274
City of Rolling Hills	Ms.	Yolanta Schwartz	Planning Director	Two Portuguese Bend Rd.		Rolling Hills	CA	90274
City of San Dimas	Mr.	Blaine Michaelis	City Manager	City Manager's Office	245 E. Bonita Ave.	San Dimas	CA	91773
City of San Dimas		Director of Community Development		San Dimas City Hall, Community Development	245 E. Bonita Ave.	San Dimas	CA	91773
City of Santa Monica	Mr.	Rod Gould	City Manager	1685 Main St., Room 209		Santa Monica	CA	90401
City of Santa Monica		Planning and Community Development Director		City Hall	1685 Main St., Room 212	Santa Monica	CA	90401
City of Signal Hill	Mr.	Kenneth R. Farfsing	City Manager	2175 Cherry Ave.		Signal Hill	CA	90755
City of Signal Hill		Director of Community Development		2175 Cherry Ave.		Signal Hill	CA	90755
City of West Hollywood	Mr.	Paul Arevalo	City Manager	8300 Santa Monica Blvd.		West Hollywood	CA	90069
City of West Hollywood	Ms.	Stephanie DeWolfe	Director of Community Development	8300 Santa Monica Blvd.		West Hollywood	CA	90069
City of Westlake Village	Mr.	Raymond B. Taylor	City Manager	31200 Oak Crest Dr.		Westlake Village	CA	91361
City of Westlake Village	Mr.	Scott Wolfe	Planning Director	31200 Oak Crest Dr.		Westlake Village	CA	91361
City of Whittier	Mr.	Jeff Collier	City Manager	13230 Penn St.		Whittier	CA	90602
City of Whittier		Director of Community Development		City of Whittier, Community Development Department	13230 Penn St., Second Floor	Whittier	CA	90602
County of San Bernardino		Director	Planning Department	385 N. Arrowhead Ave.		San Bernardino	CA	92415
County of San Bernardino	Mr.	Gregory C. Devereaux	Chief Executive Officer	385 N. Arrowhead Ave.		San Bernardino	CA	92415
Santa Monica Mountains Conservancy	Mr.	Joseph T. Edmiston, FAICP	Executive Director	Ramirez Canyon Park	5750 Ramirez Canyon Road	Malibu	CA	90265
County of Los Angeles Public Works Department	Ms.	Gail Farber	Director	900 S. Fremont Ave.		Alhambra	CA	91803
Sanitation Districts of Los Angeles County	Ms.	Grace Robinson Hyde	Chief Engineer and General Manager	1955 Workman Mill Road		Whittier	CA	90607
State Clearinghouse	Mr.	Scott Morgan	Director	1400 10th Street		Sacramento	CA	95812

DRAFT
ENVIRONMENTAL IMPACT REPORT FOR THE
LOS ANGELES REGIONAL INTEROPERABILITY
COMMUNICATION SYSTEM (LA RICS)
LAND MOBILE RADIO (LMR) SYSTEM

APPENDIX B
TECHNICAL STUDIES

B-1: AIR EMISSION MODELING

B-2: BIOLOGICAL RESOURCES

B-3: NOISE MODELING

B-4: CULTURAL RESOURCES TABLES



JANUARY 2016

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APPENDIX B-1

AIR QUALITY

CONSTRUCTION AND OPERATION EMISSIONS

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Air Quality

This air quality assessment was conducted to identify potential emission increases as a result of the proposed Project in Los Angeles County, California, including the No Project Alternative. Potential impacts would be only temporary during construction and are not anticipated to exceed any existing violations or create any new violations of the ambient air quality standards.

Regulatory Setting

Federal Regulatory Setting

Federal Standards

The federal Clean Air Act (CAA) of 1970 (42 U.S.C. § 7401 et seq.) establishes federal policies and programs that regulate air pollution in the United States. The U.S. Environmental Protection Agency (USEPA) established primary and secondary National Ambient Air Quality Standards (NAAQS) under the provisions of the CAA. The CAA not only established the NAAQS, but also sets emission limits for certain air pollutants from specific sources, sets new source performance standards based on best demonstrated technologies, and established national emissions standards for hazardous air pollutants. Federal NAAQS are currently established for seven pollutants (known as “criteria pollutants”): carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter equal to or less than 10 micrometers in aerodynamic diameter (PM₁₀), particulate matter equal to or less than 2.5 micrometers in aerodynamic diameter (PM_{2.5}), and lead (Pb). The State of California has also established emission limits for the above-mentioned criteria pollutants that are more stringent than the NAAQS. In addition, California has set standards for four pollutants not addressed by federal standards: Visibility Reducing Particles, Sulfates, Hydrogen Sulfides, and Vinyl Chloride. Table 1 summarizes the National and California AAQS for air quality pollutants.

Table 1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹	Federal Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
Ozone	1 Hour	0.09 ppm (180 µg/m ³)	—	Same as Primary Standard
	8 Hour	0.07 ppm (137 µg/m ³)	0.075 ppm (147 µg/m ³)	
Respirable Particulate Matter (PM ₁₀) ⁶	24 Hour	50 µg/m ³	150 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m ³	—	
Fine Particulate Matter (PM _{2.5}) ⁶	24 Hour	No Separate State Standard	35 µg/m ³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m ³	12.0 µg/m ³	15 µg/m ³

Table 1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹	Federal Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	—
	8 Hour	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	—	
Nitrogen Dioxide (NO ₂) ⁷	1 Hour	0.18 ppm (339 µg/m ³)	0.1 ppm (188 µg/m ³)	None
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as Primary Standard
Sulfur Dioxide (SO ₂) ⁸	1 Hour	0.25 ppm (655 µg/m ³)	0.075 ppm (196 µg/m ³)	—
	3 hour	—	—	0.5 ppm (1300 µg/m ³)
	24 Hour	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ⁸	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)	—
Lead (Pb) ^{9,10}	30 Day Average	1.5 µg/m ³	—	—
	Calendar Quarter	—	1.5 µg/m ³ (for certain areas)	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m ³	
Visibility Reducing Particles ¹¹	8 Hour	Extinction coefficient of 0.23 per kilometer—visibility of 10 miles or more (0.07 – 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70%.	No Federal Standard	
Sulfates	24 Hours	25 µg/m ³		
Hydrogen Sulfides	1 Hour	0.03 ppm (42 µg/m ³)		
Vinyl Chloride ⁹	24 Hour	0.01 ppm (26 µg/m ³)		
Notes:				
1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM ₁₀ , PM _{2.5} , and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.				
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than				



Table 1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ¹	Federal Standards ²	
		Concentration ³	Primary ^{3,4}	Secondary ^{3,5}
<p>once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.</p>				
<p>3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.</p>				
<p>4. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.</p>				
<p>5. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.</p>				
<p>6. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM10 standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.</p>				
<p>7. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.</p>				
<p>8. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.</p>				
<p>1) Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.</p>				
<p>9. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.</p>				
<p>10. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.</p>				
<p>11. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.</p>				
<p>Source: California Air Resources Board, "Ambient Air Quality Standards." Internet URL: http://www.arb.ca.gov/research/aaqs/aaqs2.pdf. Accessed July 19, 2015.</p>				

General Conformity

Under the general conformity rule, determinations are made based on *de minimis* levels. These *de minimis* levels can be found in 40 CFR 93.153(b) and vary according to the type of pollutant and severity of the nonattainment area. Table 2 summarizes *de minimis* levels. These levels were established to focus on those federal actions likely to have the most significant impacts on air quality. If the Project's emissions are below the *de minimis* levels, then it is assumed the Project would not result in any significant air quality impacts and no further analysis is required. Conversely, if the Project's emissions exceed *de minimis* levels, then the Project would require a conformity determination; however, the federal agency is allowed to make changes to the project design before the action occurs to reduce emissions below *de minimis* levels.

Table 2: De Minimis Levels by Type of Pollutant

Criteria Pollutant	Tons/Year	
	Non-Attainment Area	Maintenance Area
Ozone (VOCs or NO _x)	25 (severe) 50 (serious)	100
Ozone (inside transport region – VOCs)	50	50
Ozone (outside transport region)	100	100
Carbon Monoxide, SO ₂ , and NO ₂	100	100
PM ₁₀	70 (serious) 100 (moderate)	100
PM _{2.5}	100	100
Lead	25	25

Source: USEPA, "General Conformity De Minimis Levels" Internet URL: <http://www.epa.gov/oar/genconform/deminimis.html>. Accessed July 21, 2015.

Greenhouse Gases

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change by the United Nations and World Meteorological Organization in 1988 has led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (NO_x), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride, HFC-23 (fluoroform), HFC-134a (s, s, s, 2-tetrafluoroethane), and HFC-152a (difluoroethane).

Although climate change and GHG reduction is a concern at the federal level; currently no federal regulations or legislation have been enacted that specifically address GHG emissions reductions and climate change at the project level. Climate change and its associated effects are being addressed through various efforts at the federal level to improve fuel economy and energy efficiency, such as the “National Clean Car Program” and Executive Order (EO) 13693 - Planning for Federal Sustainability in the Next Decade (March 19, 2015), which replaced EO 13514 Federal Leadership in Environmental, Energy and Economic Performance (October 5, 2009).

Whereas EO 13693 was focused on strategies for reducing greenhouse gases internally in federal agency missions, programs and operations, including participation in the interagency Climate Change Adaptation Task Force, EO 13514 sets reduction targets for three categories “scopes” of emissions. Scope 1 emissions are direct greenhouse gas emissions from sources that are owned or controlled by a federal agency. Scope 2 emissions are direct greenhouse gas emissions resulting from the generation of electricity, heat, or steam purchased by a federal agency. Scope 3 emissions are from sources not owned or directly controlled by a federal agency, but related to agency activities such as vendor supply chains, delivery and transportation services, and employee travel and commuting.

State Regulatory Setting

The California Environmental Protection Agency Air Resources Board (CARB) is responsible for ensuring that California ambient air quality standards (CAAQS) (Table 1) are met for certain pollutants and averaging periods. State standards are to be achieved through district-level air quality management plans that are incorporated into the State Implementation Plan.

CARB traditionally has established state air quality standards, maintained oversight authority in air quality planning, developed programs for reducing emissions from motor vehicles, developed air emission inventories, collected air quality and meteorological data, and approved state implementation plans.

The California CAA focuses on attainment of the CAAQS and requires designation of attainment and nonattainment areas with respect to these standards. The act also requires that local and regional air districts expeditiously adopt and prepare an air quality attainment plan if the district violates CAAQS for O₃, CO, SO₂, or NO₂. No locally prepared attainment plans are required for areas that violate state PM₁₀ standards. CARB is responsible for developing plans and projects that will comply with the state PM₁₀ standards.

Greenhouse Gases

With the passage of several pieces of legislation including State Senate and Assembly Bills and Executive Orders, California launched an innovative and proactive approach to dealing with GHG emissions and climate change at the state level. The goal of Executive Order S-3-05 is to reduce California’s GHG emissions to 1990 levels by 2020 and 80 percent below the 1990 levels by the year 2050. Assembly Bill 32 (AB 32), the Global Warming Solutions Act of 2006, set the same overall GHG emissions reduction

goals as outlined in Executive Order S-3-05, while further mandating that CARB create a plan, which includes market mechanisms, and implements rules to achieve “real, quantifiable, cost-effective reductions of greenhouse gases.” Senate Bill 97 (Chapter 185, 2007) required the Governor's Office of Planning and Research (OPR) to develop recommended amendments to the CEQA Guidelines for addressing greenhouse gas emissions. The amendments became effective on March 18, 2010.

Local Regulatory Setting

The proposed Project is located within portions of the Mojave Desert Air Basin (MDAB) and the South Coast Air Basin (SCAB) [see Figure 1]. Three of 54 planned sites located in the MDAB would be under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD). The remaining 51 planned sites are located in the SCAB would be under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). These agencies regulate air pollution and operate air monitors throughout the air basins. In addition, the proposed Project is under the jurisdiction of 29 cities. Air quality is managed through land use and development planning practices, which are implemented through the cities’ general planning processes.

The proposed Project may be subject to one or more of the following rules and/or plan elements:

- AVAQMD Regulation IV, Rule 403 (2010) – Fugitive Dust
- AVAQMD Regulation IV, Rule 404 (1986) – Particulate Matter - Concentration
- AVAQMD Regulation XI, Rule 1110.2 (2003) – Emissions from Stationary, Non-road & Portable Internal Combustion Engines
- AVAQMD Regulation XXX, Rule 3011 (2011) – Greenhouse Gas Provisions of Federal Operating Permits
- SCAQMD Regulation IV, Rule 403 (2005) – Fugitive Dust
- SCAQMD Regulation IV, Rule 404 (1986) – Particulate Matter - Concentration
- SCAQMD Regulation XI, Rule 1110.1 (2005) – Emissions from Stationary Internal Combustion Engines
- SCAQMD Regulation XXVII, Rule 2701 & 2702 (2010) – Climate and Greenhouse Gases
- City of Agoura Hills – 2035 General Plan (2010), Chapter 4.15 Climate Change
- City of Burbank – 2035 General Plan (2013), Chapter 2 Air Quality and Climate Change Element, Goal 3 -Reduction of GHGs and Goal 4 - Climate Change
- City of Chino Hills – 2025 General Plan (2010), Chapter 9 Open Space and Conservation, Goal OSC-5 Reduce GHG emissions by 15 percent below 2005 levels by 2030
- City of West Hollywood – 2035 General Plan (2011), Climate Action Plan

Figure 1: Air Basins, Management Districts, Class I Areas, LMR Site Locations



CEQA Significance Criteria

Antelope Valley Air Quality Management District

Projects are considered significant if they trigger or exceed the most appropriate evaluation criteria. The AVAQMD has established significance thresholds most appropriate for a given project.

1. Generates total emissions (direct and indirect) in excess of the thresholds given in Table 3
2. Generates a violation of any ambient air quality standard when added to the local background
3. Does not conform with the applicable attainment or maintenance plan(s)
4. Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1

Table 3: AVAQMD Significant Emissions Thresholds

Pollutant	Tons/Year	
	Annual Threshold (tons)	Daily Threshold (pounds)
Greenhouse Gases (CO ₂ e)	100,000	548,000
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO _x)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO _x)	25	137
Particulate Matter (PM ₁₀)	15	82
Particulate Matter (PM _{2.5})	15	82
Hydrogen Sulfide (H ₂ S)	10	54
Lead (Pb)	0.6	3

Source: Antelope Valley AQMD "California Environmental Quality Act (CEQA) and Federal Conformity Guidelines" Internet URL:<http://www.avaqmd.ca.gov/Modules/ShowDocument.aspx?documentid=2908>. Accessed July 21, 2015.

A significant project must incorporate mitigation sufficient to reduce its impacts to a level that is not significant. A project that cannot mitigate to a level that is not significant must incorporate all feasible mitigation. Annual and daily thresholds are provided so that a multi-phased project (such as a project with a construction phase and a separate operational phase) with phases shorter than one year can be compared to the daily value.

South Coast Air Quality Management District

The SCAQMD has also established significance thresholds that are provided in Table 4 to be evaluated and compared to potential significant adverse air quality impacts.

Table 4: SCAQMD Significant Emissions Thresholds

Mass Daily Thresholds		
Pollutant	Construction	Operation
NO _x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk greater than or equal to 10 in 1 million Cancer Burden greater than 0.5 excess cancer cases (in areas greater than or equal to 1 in 1 million) Chronic & Acute Hazard Index greater than or equal to 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^a		
NO ₂ 1-hour average Annual arithmetic mean	SCAQMD is in attainment: project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM ₁₀ 24-hour average Annual average	10.4 µg/m ³ (construction) ^b and 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^c and 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment: project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month Average Quarterly Average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal) 1.5 µg/m ³ (federal)	

Table 4: SCAQMD Significant Emissions Thresholds

Mass Daily Thresholds
<p>Source: South Coast AQMD “SCAQMD Air Quality Significance Thresholds” Internet URL: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed July 21, 2015.</p> <p>a Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise state.</p> <p>b Ambient air quality threshold based on SCAQMD Rule 403.</p> <p>KEY: lbs/day=pounds per day; ppm=parts per million; $\mu\text{g}/\text{m}^3$=microgram per cubic meter MT/yr CO₂eq=metric tons per year of CO₂ equivalents.</p>

Environmental Setting

Climate and Meteorology

The project is located within portions of the Mojave Desert Air Basin (MDAB) and the South Coast Air Basin (SCAB). The SCAB is almost completely enclosed by mountains to the north and east, resulting in a fairly regular daily reversal of wind direction – offshore at night and onshore during the day. With the concentrated population and industry, pollution products tend to accumulate and remain within this circulation pattern. The MDAB is separated from the southern California coastal and central California valley regions by mountains (highest elevation approximately 10,000 feet).

Summer is a dry period over most of the state due to the semi-permanent Pacific high pressure that deflects most storms far to the north. In winter, the Pacific High weakens and shifts southward. Upwelling ceases, and winter storms become frequent.

According to the Western Regional Climate Center (WRCC), the most representative monitoring station within the SCAB is located in Los Angeles, California. Climatic data was collected from the Los Angeles monitoring station for this analysis. Temperature and precipitation data recorded in Los Angeles from 1906 to 2013 is summarized below. Average maximum temperatures during the winter and summer months range from 66.4 to 83.1, respectively. Annual average precipitation is approximately 14 inches with over 95 percent of the seasonal rainfall between October and April.

According to the WRCC, the most representative monitoring station within the MDAB is located in Lancaster, California. Climatic data was collected from the Lancaster monitoring station for this analysis. Temperature and precipitation data recorded in Lancaster from 1974 to 2013 is summarized below. Average maximum temperatures during the winter and summer months range from 57.4 to 96.5, respectively. Annual average precipitation is approximately 7 inches with over 90 percent of the seasonal rainfall between October and April.

Attainment Status

Areas can be classified as non-attainment, maintenance, attainment, or unclassified. Geographic areas that exceed a particular National and/or State Ambient Air Quality Standards (NAAQS and CAAQS) for a criteria pollutant are considered “non-attainment” areas for that pollutant. Conversely, areas that are below a criteria pollutant standard are considered “attainment.” Maintenance areas are defined as previously exceeding the NAAQS or CAAQS (non-attainment) for a criteria pollutant, but are presently attaining that standard. Maintenance areas are required to develop a maintenance plan outlining steps for continued attainment over the maintenance period. Table 5 summarizes the attainment status within the proposed Project area.

Table 5: Attainment Status within the Project Area			
Criteria Pollutant	County	Federal Status	State Status
Mojave Desert Basin			
Carbon Monoxide	Los Angeles and San Bernardino	Attainment	Attainment
Lead	Los Angeles and San Bernardino	Attainment	Attainment
Nitrogen Dioxide	Los Angeles and San Bernardino	Attainment	Attainment
Ozone	Los Angeles and San Bernardino	Non-attainment	Non-attainment
PM _{2.5}	Los Angeles and San Bernardino	Attainment	Non-attainment (San Bernardino only)
PM ₁₀	Los Angeles and San Bernardino	Non-attainment (San Bernardino only)	Non-attainment
Sulfur Dioxide	Los Angeles and San Bernardino	Attainment	Attainment
Particulate sulfate	Los Angeles and San Bernardino	n/a	Attainment
Hydrogen sulfide	Los Angeles and San Bernardino	n/a	Unclassified
Visibility reducing particles	Los Angeles and San Bernardino	n/a	Unclassified
South Coast Air Basin			
Carbon Monoxide	Los Angeles, Orange, and San Bernardino	Maintenance	Attainment
Lead	Los Angeles, Orange, and San Bernardino	Non-attainment (Los Angeles only)	Attainment
Nitrogen Dioxide	Los Angeles, Orange, and San Bernardino	Maintenance	Attainment
Ozone	Los Angeles, Orange, and San Bernardino	Non-attainment	Non-attainment
PM _{2.5}	Los Angeles, Orange, and San Bernardino	Non-attainment	Non-attainment
PM ₁₀	Los Angeles, Orange, and San Bernardino	Attainment	Non-attainment
Sulfur Dioxide	Los Angeles, Orange, and San Bernardino	Attainment	Attainment

Table 5: Attainment Status within the Project Area

Criteria Pollutant	County	Federal Status	State Status
Particulate sulfate	Los Angeles, Orange, and San Bernardino	n/a	Attainment
Hydrogen sulfide	Los Angeles, Orange, and San Bernardino	n/a	Unclassified
Visibility reducing particles	Los Angeles, Orange, and San Bernardino	n/a	Unclassified

Source: California Air Resources Board “Area Designations” Internet URL: <http://www.arb.ca.gov/desig/adm/adm.htm> Accessed July 7, 2014.

USEPA “Green Book” Internet URL: <http://www.epa.gov/oar/oaqps/greenbk/>. Accessed July 7, 2014.

n/a – not applicable

Existing Air Quality Monitoring Data

The EPA and local air districts maintain a statewide network of monitoring stations that routinely measure pollutant concentrations in the ambient air. These stations provide data to assess compliance with the NAAQS and CAAQS and to evaluate the effectiveness of pollution control strategies. The AVAQMD maintains and operates one of 14 monitoring stations located within the MDAB. The SCAQMD maintains and operates all 33 monitoring stations located within the SCAB. Daily and historical monitoring data is available through the CARB website < <http://www.arb.ca.gov/aqd/aqmoninca.htm>>.

Fugitive Dust

Fugitive dust is particulate matter which becomes airborne and has the potential to adversely affect human health or the environment. The most common forms of fugitive dust include PM₁₀ and PM_{2.5}. Fugitive dust is mainly generated from construction activities such as earth moving, paved road trackout, driving on haul roads, and disturbing surface areas.

Class I Areas

Construction activities contribute to visibility concerns in nonattainment and maintenance areas through their primary PM_{2.5} and NO_x emissions which contribute to the formation of secondary PM_{2.5}. Under the provisions of the CAA, EPA has designated a number of areas, including national parks and wilderness areas, in the State of California as Mandatory Class I Federal Areas where visibility is an important value. These mandatory Class I areas are listed in 40 CFR 81.406. Under the EPA Regional Haze Rule (RHR), states must establish goals to improve visibility in Class I areas and develop long-term strategies to reduce emissions of air pollutants that cause visibility impairment. These goals are outlined in the state implementation plans.

Of the mandatory Class I areas, San Gabriel Wilderness and Cucamonga Wilderness are the closest to the project. The nearest boundary of the San Gabriel Wilderness located in Los Angeles County is approximately 1.5 miles north from the Pine Mountain site. The nearest boundary of the Cucamonga Wilderness located in San Bernardino County is approximately 3 miles northeast from the Sunset Ridge site.

Impact Analysis

Short-Term Construction Emissions

Air pollutant emissions associated with construction of the proposed Project sites would result from diesel fuel combustion from the operation of construction equipment, gasoline and diesel fuel combustion from worker vehicle commutes to and from each job site, and airborne dust resulting from demolition activities and soil disturbance occurring during construction. Table 6 summarizes the types of construction activities, equipment used, and activity durations for a ‘composite’ proposed Project site based on preliminary information provided for construction activities at four sites¹. The table also lists equipment specifications [brake horse power (BHP) rating], equipment quantities, the number of worker trips to and from the site, and the number of days on site needed to complete each construction activity.

As shown in Table 6, six phases of construction were assumed to occur at each site including:

- Personnel and tool delivery
- Demolition of existing pavement and structures
- Preparation, involving cuts and fills, of the area where monopole, lattice tower, equipment shelters, and emergency generator will be installed
- Excavation for the monopole foundation
- Concrete pad construction
- Microwave and whip antenna installation
- Installation of cabinets, emergency generator and other ground-based equipment

¹ Black Jack Peak (BJM), Whitaker Ridge (WTR), LA County Fire Station 119 (LACF 119), and Mount McDill (MMC).

Table 6: Composite Proposed Project Site with Maximum Construction Activities

Equipment Type	Specification (BHP)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Personnel and Tool Delivery						
F250 Antenna and Line Truck	306	4	0.067	600 ²	30	Haul equipment.
F550 Civil Truck	306	1	0.067	150	30	Haul personnel.
Demolition						
Concrete Saw ²	81[27] ⁴	1	7	1	1	Break up existing concrete.
Mini Excavator	22.9	1	4	1	1	Cut and fill work.
Dump Truck	450	1	8	1	8	Haul off excess material.
2,000 Gallon Water Truck	210	1	1	1	1	Dust control.
Site Preparation						
Mini Excavator	22.9	1	4	1	15	Cut and fill work.
Excavation						
Auger Drill Rig ²	205 [206] ⁴	1	3	1	2	Install fences, excavate foundation holes and bores.
Excavator	153	1	5	1	10	Trenching.
Cat Skid Steer	73	1	4	1	10	Move excavated soil on site.
2,000 Gallon Water Truck	210	1	1	3	10	Dust control.
Pad Construction						
Concrete Truck	450	1	1	19	19	Pour concrete.
Monopole/Shelter/Tower and Equipment Installation						
3-Ton Flatbed Truck	400	1	3	1	2	Haul materials and equipment.
250-Ton Crane	530	1	8	2	4	Monopole/shelter installation, tower assembly.
8,000 Pound Reach Fork	60	1	4	2	5	Access structures, string conductor, modify structure arms, tree trimming/removal, etc.
Portable Generator ²	84 [7] ²	1	6	1	10	Operate power tools.
<ol style="list-style-type: none"> 1. Maximum six week total construction duration. 2. Assume 5 daily round trips per vehicle per construction day. CalEEMod approximates worker vehicle trips by assigning 1.25 trips per piece of construction equipment not used for buildings or architectural coatings. This is equal to 750 total trips for a 6-week construction schedule. 3. Trips for this piece of equipment accounted for elsewhere in the construction sequencing (F550 or 3-Ton Flatbed trips). 4. Horsepower and usage data referenced from <i>Broadband Technology Opportunities Program Final Environmental Assessment, Los Angeles Regional Interoperable Communications System LTE System</i> (NTIA 2014). 						

A six-week construction schedule operating five weekdays per week was also assumed. Not all construction phases, equipment types, or activity durations will occur at all 54 proposed Project sites; therefore, this methodology represents a maximum construction emissions scenario for all sites. The composite site construction scenario would have overlapping activities including 30 commuting weekdays, one day of demolition, 15 days for site preparation, 10 maximum days for site excavation, 19 days of pad construction, and 10 maximum days of tower and equipment installation occurring within the overall construction timeframe.

Construction emissions were determined using the California Emission Estimator Model (CalEEMod) v 2013.2.2 developed with the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the SCAQMD and other California air districts (EIC, 2013). The model quantifies direct emissions from construction for a variety of land use projects. Significant impacts of the project construction would occur if (1) the CAAQS and NAAQS for criteria pollutants are exceeded, (2) if the project does not conform to applicable attainment or maintenance plans, or (3) if the project exposes sensitive receptors to substantial pollutant concentrations (local significance thresholds).

Three of the proposed Project sites are located in the MDAB and subject to AVAQMD threshold requirements, and the remaining 51 are located in the SCAB and subject to SCAQMD threshold requirements. Separate CalEEMod model runs were completed to determine emissions from a composite site located in each air management district. Construction emissions that are below the AVAQMD and SCAQMD significance thresholds for criteria pollutants (see Table 3 and Table 4), respectively would demonstrate that significant impacts do not occur under the first two significant impact conditions. The analysis focuses on four of the criteria pollutants for which either the MDAB, the SCAB, or both are in nonattainment or maintenance: CO, PM_{2.5}, PM₁₀, and NO_x as well as CARB-designated reactive organic gases (ROG), which is any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, among others². ROGs are a precursor of criteria pollutant O₃.

Proposed Project Sites Located in the MDAB

Table 7 presents the results of the anticipated maximum daily and annual emissions from a composite proposed Project site located within the portion of the MDAB that is under the jurisdiction of the AVAQMD. Compliance with significance thresholds for the four listed criteria pollutants (NO_x, CO, PM₁₀, PM_{2.5}) and reactive organic compounds (ROG), which are O₃ precursors, demonstrates that significant impacts would not occur due to an exceedance of the CAAQS/NAAQS and demonstrates conformity to applicable attainment or maintenance plans³. In addition, compliance with these thresholds and the relative distance to the San Gabriel Wilderness and the Cucamonga Wilderness indicate that

²Additional compounds are listed in *Definitions of VOC and ROG* (CARB, 2004).

³ 2004 Ozone Attainment Plan [State and Federal] (AVAQMD, 2004), *Federal 8-Hour Ozone Attainment Plan* [Western Mojave Desert Non-attainment Area] (AVAQMD, 2008), *Implementation Schedule for Measures to Reduce PM pursuant to H&S Code 39614[d]* (AVAQMD, 2005), *CEQA and Federal Conformity Guidelines*.

construction emissions from LMR sites located in the MDAB would not have a measurable air quality impact on Class I Federal Areas.

Table 7: Construction Emissions for Composite Site within the MDAB

	AVAQMD Maximum Emissions									
	Daily (lbs/day)					Annual (tons/year)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Unmitigated Emissions	0.65	7.13	5.34	0.97	0.30	0.01	0.11	0.08	0.02	<0.01
AVAQMD Threshold	137	137	548	82	82	25	25	100	15	15

Proposed Project Sites Located in the SCAB

Table 8 presents the results of the anticipated maximum daily emissions from a composite proposed Project site located within the SCAB and under the jurisdiction of the SCAQMD. Compliance with significance thresholds for the listed criteria pollutants and ROG demonstrates that significant impacts would not occur due to an exceedance of the CAAQS/NAAQS and demonstrates conformity to applicable attainment or maintenance plans⁴.

SCAQMD Sensitive Receptor Areas – Local Significance Thresholds

For sites located in the SCAB and under SCAQMD jurisdiction, impact avoidance of the third significant impact condition for construction emissions (substantial pollutant concentrations) is demonstrated by using a screening methodology to determine the exposure of sensitive receptors to local significance thresholds. These thresholds modify the maximum daily emissions limits shown in Table 8 based on the location of the nearest sensitive land use (receptor) within a designated sensitive receptor area (SRA) to the source of construction emissions. Table 9 lists the distance from each proposed Project site to the nearest receptor and the modified daily emissions threshold for the associated SRA. The modified maximum daily thresholds assume attainment of ambient air quality standards for each pollutant as defined in *SCAQMD Air Quality Significance Thresholds* at the nearest sensitive receptor location (SCAQMD 2011)⁵.

⁴ Final 2012 Air Quality Management Plan (SCAQMD, 2012); Final 1999 Amendment to the 1997 Ozone State Implementation Plan Revision (SCAQMD, 1999).

⁵ South Coast Air Quality Management District. 2011. *SCAQMD Air Quality Significance Thresholds*. Website <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed May 12, 2015.

Table 8: Construction Emissions for Composite Site within the SCAB

	SCAQMD Maximum Emissions (lbs./day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Unmitigated Emissions	0.67	7.27	5.54	1.02	0.41
Mitigated Emissions	0.65	7.14	5.33	0.71	0.34
SCAQMD Threshold	75	100	550	150	55

The screening methodology is applicable to the proposed Project because the construction footprint for each site is less than 5 acres. The district has not established local thresholds for ROG. As shown in the table, daily construction emissions from the composite site would be below the SRA threshold at the nearest sensitive receptor location within each SRA. The site where daily construction emissions of 1.02 lbs./day approach the SRA limit is ASD, with the maximum daily emissions reduced from 150 lbs./day to 4 lbs./day based on the proximity of the nearest sensitive area. Therefore, compliance with local significance thresholds is demonstrated.

Table 9: Construction Emissions for Composite Site within SCAQMD Sensitive Receptor Areas

Site ID	Receptor	Distance (meters)	SRA	Modified Maximum Daily Emissions Limit (lbs./day) ¹				Comply
				NO _x	CO	PM ₁₀	PM _{2.5}	
AGH	Single family home	302	6 – West San Fernando Valley	245	6,815	155	79	Yes
AJT	Industrial building	107	33 – Southwest San Bernardino Valley	334	5,691	103	32	Yes
ASD	Kiosk	6	4 - South Coastal LA County	57	585	4	3	Yes
BJM	Campsite	504	15 – San Gabriel Mountains	273	8,174	131	74	Yes
BUR	Campsite	2,102	15 - San Gabriel Mountains	273	8,174	131	74	Yes
BUR1	Campsite	2,115	15 - San Gabriel Mountains	273	8,174	131	74	Yes
BUR2	Campsite	2,026	15 - San Gabriel Mountains	273	8,174	131	74	Yes
BUR3	Campsite	1,998	15 - San Gabriel Mountains	273	8,174	131	74	Yes
CPK	Office trailer	71	2 – Northwest Coastal LA County	82	1,233	27	10	Yes
DPK	Single family home	1,707	n/a	-	-	-	-	Yes ²
ENC1	Single family home	32	2 – Northwest Coastal LA County	103	785	12	4	Yes
ENT	Single family home	110	2 – Northwest Coastal LA County	156	2,367	57	18	Yes

Table 9: Construction Emissions for Composite Site within SCAQMD Sensitive Receptor Areas

Site ID	Receptor	Distance (meters)	SRA	Modified Maximum Daily Emissions Limit (lbs./day) ¹				Comply
				NOx	CO	PM ₁₀	PM _{2.5}	
FTP	Golf course	262	8 – West San Gabriel Valley	164	7,207	152	77	Yes
GMT	Single family home	1,745	15 – San Gabriel Mountains	273	81,74	131	74	Yes
GRM	Single family home	817	2 – Northwest Coastal LA County	245	7,724	146	77	Yes
H-17A	Single family home	282	11 – South San Gabriel Valley	193	6,884	153	83	Yes
H-69B	Single family home	52	2 – Northwest Coastal LA County	121	1,259	27	8	Yes
JOP	Federal government building	1,683	15 – San Gabriel Mountains	273	8,174	131	74	Yes
JPK	Single family home	2,288	15 – San Gabriel Mountains	273	8,174	131	74	Yes
JPK2	Single family home	2,229	15 – San Gabriel Mountains	273	8,174	131	74	Yes
LACF072	Single family home	12	2 – Northwest Coastal LA County	103	562	4	3	Yes
LACFCP08	Industrial building	86	2 – Northwest Coastal LA County	121	1,233	27	8	Yes
LACFCP09	Industrial building	15	15 – San Gabriel Mountains	114	590	4	3	Yes
LACFCP11	Single family home	644	15 – San Gabriel Mountains	273	8,174	131	74	Yes
LARICSHQ	Office building	91	11 – South San Gabriel Valley Angeles	96	1,113	7	29	Yes
LEPS	Single family home	13	2 – Northwest Coastal LA County	103	562	4	3	Yes
MML	Church	5,359	15 - San Gabriel Mountains	273	8,174	131	74	Yes
MTL2	Single family home	2,491	15 – San Gabriel Mountains	273	8,174	131	74	Yes
OAT	Industrial building	837	6 – West San Fernando Valley	245	6,815	155	79	Yes
OMC	Industrial building	22	13 - Santa Clarita Valley	114	590	4	3	Yes
PASPD01	Office building	15	8 - West San Gabriel Valley	69	535	4	3	Yes
PDC	Police station	18	1 – Central LA	74	680	5	3	Yes
PHN	Industrial building	21	10 - Pomona/Walnut	103	612	4	3	Yes

Table 9: Construction Emissions for Composite Site within SCAQMD Sensitive Receptor Areas

Site ID	Receptor	Distance (meters)	SRA	Modified Maximum Daily Emissions Limit (lbs./day) ¹				Comply
				NOx	CO	PM ₁₀	PM _{2.5}	
			Valley					
PMT	Reservoir	3,972	15 - San Gabriel Mountains	273	8,174	131	74	Yes
PWT	Single family home	161	2 – Northwest Coastal LA County	156	2,367	57	18	Yes
RIH	Cemetery	267	11 – South San Gabriel Valley Angeles	193	6,884	153	83	Yes
SDW	Single family home	59	10 – Pomona/Walnut Valley	185	1,741	26	7	Yes
SGH	Single family home	29	4 - South Coastal LA County	58	789	13	5	Yes
SIM	Commercial building	41	1 – Central LA	74	882	15	5	Yes
SPN	Single family home	223	2 – Northwest Coastal LA County	245	7,724	146	77	Yes
SUN	Industrial building	241	15 - San Gabriel Mountains	273	8,174	131	74	Yes
SUN2	Industrial building	241	15 - San Gabriel Mountains	273	8,174	131	74	Yes
TOP	Single family home	407	2 – Northwest Coastal LA County	245	7,724	146	77	Yes
TPK	Equestrian center	4,707	15 – San Gabriel Mountains	273	8,174	131	74	Yes
TWR	Cabins	1,620	n/a	-	-	-	-	Yes ²
VPK	Single family home	1,624	8 - West San Gabriel Valley	164	7,270	152	77	Yes
WAD	Single family home	49	2 – Northwest Coastal LA County	103	833	12	4	Yes
WMP	Single family home	11,312	15 – San Gabriel Mountains	273	8,174	131	74	Yes
WS1	Hotel	30	2 – Northwest Coastal LA County	103	833	12	5	Yes
WTR	Single family home	2,901	15 – San Gabriel Mountains	273	8,174	131	74	Yes
ZHQ	Retail	12	2 – Northwest Coastal LA County	103	562	4	3	Yes

Source: Localized Significance Thresholds (SCAQMD, 2014).

1. The modified maximum daily thresholds are based on attainment of ambient air quality standards for each pollutant as defined in *SCAQMD Air Quality Significance Thresholds* at the nearest sensitive receptor location (SCAQMD 2011).

2. Site DPK is not located within a SRA boundary.

Construction Sequencing

Using the maximum daily construction emissions for a composite site located in the SCAB from Table 8, a minimum schedule for completing the construction of all 51 proposed Project sites without exceeding the daily threshold for the listed criteria pollutants was determined. Emissions for NO_x from the construction of the composite site are the highest among these pollutants. The maximum number of sites that can begin construction simultaneously (sites starting) was determined by summing the daily emissions for multiple sites up to a point where total daily emissions would remain below the 100 lbs./day threshold for NO_x. Once started, these sites were assumed to be under active construction (active sites) through the anticipated six-week construction schedule for each site. Additional site construction starts would not occur unless total daily emissions, including the new sites, remain below the NO_x threshold.

As shown in Table 10, a maximum of 13 sites could be started with up to 28 sites under construction simultaneously without exceeding the 100 lbs./day emissions threshold for NO_x. Construction could be completed in 100 days without implementing Tier 4 emission standards for construction equipment. Under this mitigated scenario construction could be completed in 98 days. All three sites located in the AVAQMD could be started and under construction simultaneously without exceeding emissions thresholds for any criteria pollutant.

Table 10: Minimum Construction Schedule within SCAB to Complete All 51 Sites

Scenario	Calendar Days	Maximum Sites Starting	Maximum Active Sites
Unmitigated	100	13	28
Mitigated	98	16	37

Operational Emissions

Maintenance Activities

Operational emissions associated with the composite proposed Project site include emissions from vehicles transporting routine maintenance personnel to service LMR equipment. The EMFAC2011-LDV (Light Duty Vehicles) model, developed by the CARB, was used to estimate emissions from maintenance vehicles based on an assumed monthly generator test and biannual maintenance schedule for all 78 proposed Project sites. The generator test would last one hour at each site, and test days would be evenly distributed during each month of the year. It is also assumed that maintenance days coincide with generator test days.

SCAQMD Rule 1110.2 limits emissions of NO_x, CO, and VOCs from non-emergency engines with a 50 bhp rating or greater. This emissions standard does not apply to emergency generator engines operating less than 200 hours per year; however, it was assumed that manufacturing specifications for Project site backup generators will conform to these requirements. The AVAQMD emissions standards are 36 parts-

per-million (ppm) by volume during a 15-minute operation interval for NO_x, 250 ppm for VOCs, and 2000 ppm for CO.

SCAQMD Operation Emission Thresholds

Based on this schedule, approximately 3 to 4 round trips would occur during 22 weekdays each month of the calendar year for all 51 proposed Project sites located within the SCAQMD. Table 11 shows that emissions of the four criteria pollutants and ROG are well below the daily operational thresholds established by SCAQMD for all sites combined. In addition, compliance with these thresholds and the relative distance to the San Gabriel Wilderness and the Cucamonga Wilderness indicate that construction emissions from LMR sites located in the SCAB would not have a measurable air quality impact on Class I Federal Areas.

Table 11: Operational Emissions for All Sites within SCAQMD

Emission Category	Maximum Daily Emissions (lbs)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Daily Maintenance	0.27	0.42	1.84	0.07	0.04
Generator Testing	0.22	1.15	1.59	0.12	0.12
Total Daily Emissions	0.49	1.57	3.43	0.19	0.16
Threshold (lbs/day)	55	55	550	150	55
Exceedance	No	No	No	No	No

AVAQMD Operation Emission Thresholds

Based on a similar monthly generator testing and biannual maintenance schedule that is coincident with the generator testing, five round trips would occur each month of the calendar year for the proposed Project sites located within the AVAQMD. Table 12 shows that emissions of the four criteria pollutants and ROG are well below the daily operational thresholds established by AVAQMD for all sites combined. In addition, compliance with these thresholds and the relative distance to the San Gabriel Wilderness and the Cucamonga Wilderness indicate that construction emissions from LMR sites located in the MDAB would not have a measurable air quality impact on Class I Federal Areas.

Table 12: Operational Emissions for All Sites within AVAQMD

Emissions Category	Maximum Daily Emissions (lbs)					Maximum Annual Emissions (tons)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Maintenance	0.02	0.06	0.24	0.01	0.01	<0.01	<0.01	0.03	<0.01	<0.01
Generator Testing	0.02	0.08	0.11	0.01	0.01	<0.01	0.01	0.01	<0.01	<0.01
Total	0.04	0.14	0.35	0.02	0.02	<0.01	0.01	0.04	<0.01	<0.01
Threshold (lbs/day)	137	137	548	82	82					
Threshold (tons/year)						25	25	100	15	15
Exceedance	No	No	No	No	No	No	No	No	No	No

Greenhouse Gas Emissions

Generation of GHG emissions can be determined based on the anticipated generator testing schedule and SCAQMD/AVAQMD emission factors. CalEEMod was used to calculate carbon dioxide equivalent (CO₂e) emissions from off-road construction equipment usage and on-road vehicle trips for construction workers to each proposed Project site amortized over a 30-year project life-cycle. Start-up and running CO₂ emissions from construction worker vehicles were determined using EMFAC2011-LDV. Finally, GHG emissions from electricity consumption by equipment (monopole/antennas) at each proposed Project site was determined with an assumed power rating and supply source (e.g., Los Angeles Department of Water and Power).

Total annual GHG emissions for all 78 proposed Project sites, 51 in the SCAQMD and 3 located in the AVAQMD, are shown in Table 13. The Council on Environmental Quality (CEQA) “presumptive effects threshold”⁶ for GHG emissions considers 25,000 annual metric tons of CO₂e an indication that federal agencies should consider project effects on climate change. As shown in the table, the estimated annual emissions of GHG resulting from the construction and operation of all 78 proposed Project sites is well below this threshold; therefore, climate change impacts are not anticipated as a result of this Project.

⁶ 25,000 metric tons may provide a useful, presumptive, threshold for discussion and disclosure of GHG emissions because it has been used and proposed in rule-makings under the Clean Air Act (e.g., EPA’s Mandatory Reporting of Greenhouse Gases Final Rule, 74 FR 56260, October 30, 2009). This threshold is used in Clean Air Act rule-makings because it provides comprehensive coverage of emissions with a reasonable number of reporters, thereby creating an important data set useful in quantitative analyses of GHG policies, programs and regulations. See 74 FR 56272. This rationale is pertinent to the presentation of NEPA analysis as well.

Table 13: Greenhouse Gas Emissions for All Sites within SCAQMD and AVAQMD

GHG Emission Source	Annual Emissions (metric tons)
Construction (Amortized over 30 year facility life)	220.13
Routine Maintenance	32.12
Generator Testing	16.44
Indirect (Electricity Generation)	2,074.79
Total	2,343.48

Analysis Conclusions

Compliance with SCAQMD and AVAQMD construction emission significance thresholds demonstrates that significant impacts would not occur due to (1) an exceedance of the CAAQS/NAAQS and (2) non-conformity with applicable attainment or maintenance plans for each district as a result of proposed Project site construction. For proposed Project sites located within the SCAB and under SCAQMD jurisdiction, daily construction emissions from a composite site would be below the SRA threshold at the nearest sensitive receptor location within each SRA. Therefore, significant impacts would not occur due to (3) non-compliance with local significance thresholds as a result of proposed Project site construction.

A maximum of 13 proposed Project sites located within the SCAB could be started with up to 28 sites under construction simultaneously without exceeding the SCAQMD daily emissions threshold for any criteria pollutant. Construction could be completed in 100 days without implementing Tier 4 emission standards for construction equipment. Under a mitigated (Tier 4) scenario, construction could be completed in 98 days. All three sites located in the MDAB could be started and under construction simultaneously without exceeding emissions thresholds for any criteria pollutant.

Operational emissions for proposed Project sites are well below the significant daily thresholds established by SCAQMD and AVAQMD for all 54 sites combined. Therefore, significant impacts would not occur as a result of proposed Project system operations. In addition, the estimated annual emissions of GHGs resulting from the construction and operation of all sites are well below the CEQA “presumptive effects threshold” of 25,000 metric tons CO₂e annually; therefore, climate change impacts are not anticipated as a result of this Project. Finally, the proposed improvements are not anticipated to have any measurable air quality impact on Class I Federal Areas.

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APPENDIX B-2

BIOLOGICAL RESOURCES

SPECIAL STATUS SPECIES IN LOS ANGELES COUNTY

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Mammals

American badger

CDFW–SSC

The American badger (*Taxidea taxus*) has a wide range in North America; occurrences in California have become rare due to habitat loss and urbanization. This species lives in grassland and scrub from the desert to the yellow pine forest. Individuals are solitary and require a large territory. They are primarily nocturnal and live in burrows, feeding on rodents. Predators include wolves, coyotes, bobcats, mountain lion, and golden eagles. Mortality also commonly occurs from vehicle strikes.

Big free-tailed bat

CDFW–SSC

The big free-tailed bat (*Nyctinomops macrotis*) is rare in California, with most records in urban San Diego, where they are year-round residents. Only vagrants would be expected in Los Angeles County. Populations occur in rocky areas below 8,000 feet. Individuals roost in caves and feed primarily on moths.

California leaf-nosed bat

BLM–S, CDFW–SSC

The California leaf-nosed bat (*Macrotis californicus*) occurs throughout southern California. Individuals roost in caves, mines, and rock shelters near foraging sites. They feed by catching insects in flight and gleaning them off leaves. Adults have one offspring a year and live for 20 to 30 years. They are not known to migrate or hibernate. As with most bats, predators include owls, coyotes, feral cats, and raccoons.

Desert bighorn sheep

BLM–S, USFS–S, CDFW–FP

Desert bighorn sheep (*Ovis canadensis nelsoni*) occur at the higher elevations and steep terrain of the San Gabriel Mountains. They escape predators by moving to steep terrain at night and when danger threatens. They live in groups and feed on a wide variety of grass, forbs, and shrubs. When they mix with cattle they are susceptible to disease. A major drop in numbers in the past was due to hunting.

Fringed myotis

BLM–S, USFS–S

The fringed myotis (*Myotis thysanodes*) is widespread along the coast and in the mountains of western North America. They are slow, maneuverable flyers and catch beetles, spiders, grasshoppers and moths in flight by leaf gleaning. Day and maternity roosts for this species are found in mines, caves, buildings, and crevices. They hibernate in winter but are easily disturbed by visitation.

Long-eared myotis

BLM–S

The long-eared myotis (*Myotis evotis*) is widespread but uncommon. Though populations are found in various habitats, mixed coniferous forests are most common. It avoids the desert and hot Central Valley. Individuals roost in a variety of locations, including tree cavities, stumps, snags, rock crevices, abandoned buildings, cracks in the ground, caves, mines, and loose bark on trees. They feed on insects,

especially beetles. They are a slow and maneuverable flyer, catching prey in flight. They nurse in small colonies of up to 30 individuals and hibernate in winter.

Los Angeles pocket mouse**CDFW–SSC**

The Los Angeles pocket mouse (*Perognathus longimembris brevinasus*) is one of seven subspecies. This species is not common, and existing populations are far apart and isolated. Its range includes much of Los Angeles and western Riverside counties. It is active when its food supply of annual grass and forb seeds is available. It also eats greens and arthropods and larvae. It prefers grasslands, alluvial scrub, and coastal sage scrub. The main threat to this species is loss of habitat due to agriculture and urbanization.

Mohave ground squirrel**BLM–S, CA–T, CDFW–SSC**

The Mohave ground squirrel (*Xerospermophilus mohavensis*) is found in the western Mojave Desert. It is a medium-sized rodent that lives in a habitat of diverse shrubs. It utilizes annual wildflowers, succulent-leaved shrubs, summer-fall seeding shrubs, and Joshua trees for food. This species is active for very short periods of time and remains dormant in low rainfall years. Its short period of activity and shy habits make it difficult to document its presence or absence through surveys. This species rarely drinks water and can actively forage during mid-day in summer, harvesting seeds, its main food supply.

Nelson’s antelope squirrel**BLM–S, CA–T**

Nelson’s antelope squirrel (*Ammospermophilus nelsoni*) is primarily from the San Joaquin Valley with historic collections in Antelope Valley in Los Angeles County. Habitat for this species includes grassy, sparsely shrubby ground in dry, flat or rolling terrain where they inhabit burrows of other small mammals. Individuals feed on green vegetation and seeds, relying on insects during the dry season. Threats to this species include loss of habitat due to agricultural and urban development.

Pallid Bat**USFS-S BLM-S**

The pallid bat (*Antrozous pallidus*) is widespread in California in arid areas, primarily the Mojave Desert. It is extremely rare in urban areas. These bats feed along the edges of woodlands and forests. They roost in bridges, buildings, and culverts. Pallid bats are leaf gleaners. They hibernate lightly, waking up to forage and drink.

Pallid San Diego pocket mouse**CDFW–SSC**

The pallid San Diego pocket mouse (*Chaetodipus fallax pallidus*) is rare, with its range just reaching southern Los Angeles County. It occurs in rocky desert and coastal sage scrub. It is solitary and nocturnal and seeks shelter in burrows. This species eats seeds, greens, and insects. Habitat loss is the main threat to this species.



CDFW–SSC

San Diego black-tailed jackrabbit

The San Diego black-tailed jackrabbit (*Lepus californicus bennettii*) is one of 17 subspecies and a year-round resident of the coastal side of the southern California mountains. Individuals eat grasses, forbs, pine and oak seedlings, and shrubs. They switch to deep-rooted shrubs in summer and can get by without much water. Normal predators include coyotes, foxes, hawks, and eagles. They are also susceptible to parasites such as ticks, fleas, lice, and mites. Threats to this species include loss of habitat.

San Diego desert woodrat

CDFW–SSC

The San Diego desert woodrat (*Neotoma lepida intermedia*) is a large rodent known to occur in northeastern and southern California. Populations can occur in most habitats in the grassland-scrub-woodland mosaic of plant communities in Los Angeles County. Individuals build large, stick nests which are their primary method of protection. Threats to this species include loss of habitat.

San Joaquin pocket mouse

BLM–S

The San Joaquin pocket mouse (*Perognathus inornatus*) occurs in the Mojave Desert portion of Los Angeles County. It inhabits grassland and creosote and saltbush scrub. It feeds on seeds, greens, and insects. This species is rare in Los Angeles County because the county is at the edge of its range.

Santa Catalina Island fox

ESA–E, CA–T

The Santa Catalina Island fox (*Urocyon littoralis catalinae*) is a miniature fox that evolved due to over 6,000 years of isolation on the various Channel Islands. Individuals are crepuscular, being most active at dawn and dusk. They are omnivorous, eating berries, cactus fruits, insects, lizards, and birds. This species is endangered and almost became extinct due to a recent outbreak of canine distemper. A vaccination program has increased the population to over 1,000. Threats from other diseases, such as ear tumors, are being studied.

Santa Catalina shrew

CDFW–SSC

The Santa Catalina shrew (*Sorex ornatus willetti*) is the smallest and rarest mammal on Catalina Island. Only seven occurrences in Avalon, Cottonwood, and Middle Canyon have been documented. Pitfall trapping has found only a few individuals. Any knowledge of its habits is based on ornate shrews (*Sorex ornatus*) on the mainland. It appears to be limited to riparian habitat with dense vegetation for cover, plenty of leaf litter for nesting, and presence of insects for feeding. Historical heavy grazing and droughts have degraded and reduced riparian habitat.

South coast marsh vole

CDFW–SSC

The south coast marsh vole (*Microtus californicus stephensi*) is one of 17 subspecies of vole; this species occurs in the Los Angeles region. It occurs primarily in the tidal marshes of Los Angeles County, as well as in the Mojave Desert. Individuals are most active at dawn and dusk, becoming nocturnal in summer. They do not hibernate. Threats to this species include loss of habitat and isolated populations.

Tehachapi pocket mouse

The Tehachapi pocket mouse (*Perognathus alticolus inexpectatus*) occurs in the Tehachapi area as far south as Lake Elizabeth. It occupies nonnative grasslands, Joshua tree woodland, chaparral, coastal sage scrub, fallow agricultural fields, pinyon-juniper woodland, yellow pine woodland, and oak savannah. It constructs burrows in loose sand from 3,500 to 6,000 feet in elevation. Very little is known about this mouse.

Townsend’s big-eared bat**BLM–S, CA–CT, CDFW–SSC**

The Townsend’s big-eared bat (*Corynorhinus townsendii*) is found throughout California. Populations occur in all habitats from the Mojave Desert to Jeffery pine forests in mountain habitats. Individuals roost and hibernate in abandoned mines and caves. They will abandon roost sites when disturbed by human activities. They feed on moths, flies, wasps, and beetle. Life expectancy ranges from 4 to 15 years. Predators include cats, raccoons, snakes, owls, and hawks.

Western mastiff bat**BLM–S, CDFW–SSC**

The western mastiff bat (*Eumops perotis californicus*) is uncommon in the Central Valley and Santa Monica Mountains in all major plant communities in the county. This species roosts on tall buildings, cliffs, tunnels, and trees. It uses major rock crevices as maternity roosts. Populations are most common where roost sites are prevalent. Individuals feed during the night, flying as much as 15 miles from their day roosts, which are solitary or in small colonies mixed with other species of bat. They forage within 200 feet over vegetation and rock outcrops. They are the largest California bat and are in a family with long narrow wings that are good for long distance flight but poor at maneuvering.

Yuma myotis**BLM–S**

The Yuma myotis (*Myotis yumanensis*) is common throughout the California desert below 8,000 feet. This species prefers forests and woodlands. Individuals roost in mines, buildings, rock crevices, caves and abandoned swallow nests below bridges. Maternal colonies of several thousand individuals occur in caves and mines. Their feeding territory and hibernation sites may differ. They forage on flying insects, primarily over water. They are poor long-distance flyers and are not known to migrate.

Birds**American peregrine falcon****CA–FP, CDFW–FP**

The American peregrine falcon (*Falco peregrinus anatum*) is a widespread species, occurring on six continents. In North America, its breeding range is local and spotty, diminished from effects of chemical poisons. This medium-sized bird of prey feeds on song birds and waterfowl, as well as bats. Adults normally nests on cliffs near water but have also adapted to tall buildings in cities. Individuals are most likely to be observed feeding in open habitats within a mile of a nest site.

**Bald Eagle****CA–E, BLM–S, USFS–S, CDFW–FP**

The bald eagle (*Haliaeetus leucocephalus*) is a large bird of prey distributed across North America from Alaska and Canada to northwest Mexico. Bald eagles occur across much of California in winter. Breeding territories occur mostly in northern California, but are known from the central and southern Sierra Nevada Mountains and foothills, southern California coastal and inland areas, and Santa Catalina Island. They occupy habitat typically near water, such as lakes, reservoirs, rivers, and coastal wetlands. Breeding habitats typically occur in mountain and foothill forests and woodlands near these areas of water. Stick nests are built in the upper canopy of the tallest trees in these areas. In some areas, such as on Santa Catalina Island, nests occur on cliffs. They hunt small animals, such as fish or waterfowl, and they feed on carrion, which can include larger animals.

Bank swallow**BLM–S, CA–T**

The bank swallow (*Riparian riparia*) has a wide distribution: across North America, Europe, and Asia and is a breeding season resident in northern and central California. Occurrence in southern California is rare due to loss of habitat. Adults nests in colonies near stream banks in vertical cliffs. Bank swallows eat flying and jumping insects while in flight, especially over open water.

Black swift**CDFW–SSC**

The black swift (*Cypseloides niger*) is a scarce summer resident of areas of western North America. Only about 200 nesting sites have been located in North America. Individuals migrate to Brazil in the winter. Adults nest in caves in cliffs in forested areas near rivers, often nesting behind waterfalls. They lay a single egg which hatches into a slow-growing chick.

Burrowing owl**BLM–S, CDFW–SSC**

The burrowing owl (*Athene cunicularia*) has a wide distribution across North America; in Los Angeles County, it has become rare due to loss of habitat. This owl species is small and dwells on the ground in dry, open areas with no trees and low grass. They can survive in urban areas, such as vacant lots, pastures, airports, cemeteries, or golf courses. They can utilize drain pipes in curbs for nesting.

California brown pelican**BLM–S, USFS–S, CDFW–FP**

The California brown pelican (*Pelecanus occidentalis californicus*) is distributed along the Pacific coast from the Channel Islands south into Mexico. It is a large, distinctive, fish-eating shore bird often seen skimming the tops of waves just off shore. They feed by diving for fish. They nest on islands free of predators.

California condor**ESA–E, ESA–CH, CA–E, CDFW–FP**

The California condor's (*Gymnogyps californianus*) primary habitat is in Ventura County. Individuals will occasionally travel to adjacent areas such as the Mojave Desert or San Gabriel Mountains. They have been seen flying and perching in the Santa Susana Hills. Condors are carrion scavengers who need broad



wilderness areas for foraging. These areas range from Pacific beaches to mountain forests and meadows. Adults nest in caves and on cliff faces.

Coastal California gnatcatcher**ESA–T, ESA–CH, CDFW–SSC**

The coastal California gnatcatcher (*Polioptila californica californica*) is a permanent resident of the coastal sage scrub below 2,500 feet elevation of southern California and northern Baja California. Much of its habitat has been converted by urbanization. Much of its remaining habitat is managed under Habitat Conservation Plans. This species prefers high diversity coastal sage scrub habitat with low-growing, succulent, and drought-tolerant deciduous species. Adults forage on insects on the ground and in shrubs.

Golden eagle**BLM–S, CDFW–FP, BGEPA**

The golden eagle (*Aquila chrysaetos*) is a large bird of prey with a widespread distribution, but it has been eliminated from most urban areas. Golden eagles prefer to hunt in open areas such as grasslands; they do not like agricultural fields or forests but are attracted to road kill and garbage dumps. Primarily they eat rabbits, ground squirrels, quail, and other ground birds, as well as large mammals such as pronghorn and young sheep. They can easily adapt to domestic animals. Eagles are hardy, and their migration distance depends on climate. In mild areas they remain year-round. They build large nests of sticks primarily on cliffs. Threats include loss of habitat, flying into utility lines, electrocution, and being run over by vehicles.

Grasshopper sparrow**CDFW–SSC**

The grasshopper sparrow (*Ammodramus savannarum*) is a small, seed-eating songbird that occurs throughout North America. This species is less common in the western United States. Populations have been declining at 2.5 percent for the last 40 years. Individuals feed on the ground, killing by pinching the thorax of the large insects, especially grasshoppers. Adults nest on the ground with highly concealed nests made of grass.

Least Bell's vireo**ESA–E, ESA–CH, CA–E, CDFW–SSC**

The least Bell's vireo (*Vireo bellii pusillus*) is distributed throughout the central and southern United States and into Mexico. Populations in California are growing to repopulate historic ranges in central and southern California. Individuals occur in dense willow riparian forest in coastal southern California and forage on insects. Preferred habitat includes low shrubs near water or dry river bottoms. Nests are placed along the margins of bushes.

Le Conte's thrasher**CDFW–SSC**

The Le Conte's thrasher (*Toxostoma lecontei*) is a medium-sized ground bird and year round resident in the southwest North America. Populations have declined due to urbanization, increased agriculture, off-road vehicle use, and increased fire and resulting nonnative weed infestation. In Los Angeles County it is



primarily found in saltbush scrub of the Mojave Desert. It moves primarily by running and can reach high speeds. It rarely flies and often jumps in order to see above the shrubs. It eats insects and small lizards. Competition is primarily from other bird species. Adults nest in thorny plants where their eggs can be eaten by ground squirrels, domestic pets, coyotes, and snakes.

Long-eared owl

CDFW–SSC

The long-eared owl (*Asio otus*) is a large, nocturnal bird of prey with a distribution across North America. They have a wide range throughout the northern hemisphere at elevations between 0 and 6,500 feet. Habitat for long-eared owls includes grasslands for foraging and dense woodland and forest areas for nesting. Individuals primarily feed on rodents but also feed on lizards and rabbits. Adults do not build nests but use nests made by other species such as ravens and hawks. One of the most serious problems is loss of woodland and forest nesting habitat. Urban Los Angeles County is not considered habitat for this species.

Mountain plover

BLM–S, CDFW–SSC

The mountain plover (*Charadrius montanus*) is a dull-colored, ground-nesting, long-legged shorebird native to the short grass prairie. They nest in the Midwest and move to southwestern North America in winter. They are increasingly relying on the Imperial Valley for overwintering. In Los Angeles County, they overwinter primarily in the Mojave Desert area. They feed on insects and often accompany cattle as they stir up the insects. In the Midwest, mountain plovers prefer to build their nests in prairie dog colonies. The decrease in prairie dogs due to agriculture is a major threat. Habitat degradation has resulted in low survival rate of the young. Fewer than 20,000 individuals now survive.

Short-eared owl

CDFW–SSC

The short-eared owl (*Asio flammeus*) is a medium-sized owl of the grasslands and breeds throughout much of North America. This species is a year-round resident in certain areas within California, although migrating population increase its numbers during winter months. Nesting may occur in the Antelope Valley of Los Angeles County. Habitat requirements include open country that supports their rodent prey and provides vegetative cover to conceal their ground nests from predators.

Southwestern willow flycatcher

ESA–E, ESA–CH, CA–E

The southwestern willow flycatcher (*Empidonax traillii extimus*) is a small insect-eating bird that breeds in only a few places in southern California. The different subspecies are difficult to tell apart and are best identified by their songs. This species nests in willow thickets and cottonwood riparian woodlands and forests, and occasionally oaks. Many such habitats are too small to support a nesting pair. Migrating birds will use ornamental trees, follow riparian areas or rivers, and visit trees at isolated springs.

**Swainson's hawk****BLM-S, CA-T**

The Swainson's hawk (*Buteo swainsoni*) breeds throughout much of western North America. In California, territories have been recorded from several locations, including the Mojave Desert. They forage in wide-open spaces, such as grasslands, and often nest in solitary trees. They are social and hang out in groups outside nesting season.

Tricolored blackbird**BLM-S, CDFW-SSC**

The tricolored blackbird (*Agelaius tricolor*) is a large-sized passerine bird that occurs in the Pacific states, primarily within California. This species is found in the same habitat as the red-winged blackbird but is far less abundant. Breeding habitat includes dense cattail (*Typha* spp.), marshes around ponds and lakes, and adjacent agricultural fields. Losses are due to loss of wetlands and the nests in the agricultural fields are destroyed during harvesting.

Western snowy plover**ESA-T, ESA-CH, CDFW-SSC**

The western snowy plover (*Charadrius alexandrinus nivosus*) is a medium-sized ground-nesting bird. The Pacific coast breeding populations occur from Washington to Mexico. Breeding habitat includes areas above the high tide line on coastal beaches, sand spits, dune-backed beaches, sparsely-vegetated dunes, beaches at creek and river mouths, and salt pans at lagoons and estuaries. Less common nesting habitats include bluff-backed beaches, dredged material disposal sites, salt pond levees, dry salt ponds, and river bars. In winter, western snowy plovers are found on many of the beaches used for nesting as well as on beaches where they do not nest, in man-made salt ponds, and on estuarine sand and mud flats. Habitat degradation caused by human disturbance, urban development, introduced beachgrass (*Ammophila* spp.), and expanding predator populations have resulted in a decline in active nesting areas and in the size of the breeding and wintering populations.

White-tailed kite**BLM-S, CDFW-FP**

The white-tailed kite (*Elanus leucurus*) is a medium-sized bird of prey with a white tail and gray back. Its distribution includes a few southern and Pacific states, including California. Although population size in California is not large, management efforts to leave agricultural fields unharvested have increased their numbers. Kites are occasionally observed in alfalfa fields in the Antelope Valley. They are primarily a grassland species, often seen hovering in agricultural fields. Individuals feed on small mammals, lizards, and insects. Nests are made in the upper third of tall trees.

Yellow-breasted chat**CDFW-SSC**

The yellow-breasted chat (*Icteria virens*) is a bright yellow and brown songbird found throughout North America, including California. Distribution includes Los Angeles County, where populations are fairly stable. Habitat for this species includes open scrub and edges of riparian forests. Individuals avoid people and are difficult to see but easily heard. They feed on insects and fruit by gleaning, and they nest in dense shrubs.

Reptiles

Silvery legless lizard

USFS-S, CDFW-SSC

The silvery legless lizard (*Anniella pulchra pulchra*) is a medium-sized gray lizard with a yellow underbelly. This subspecies is endemic to the central and southern regions of California. They live in sandy washes and dunes and migrate into leaf litter at night. They require moisture to shed their skin. They feed on ground-dwelling insects. Threats are thought to occur from loss of habitat and habitat degradation due to the introduction of ornamentals, especially in dune areas.

California mountain kingsnake (San Diego population)

BLM-S, USFS-S, CDFW-SSC

The California mountain kingsnake (*Lampropeltis zonata pulchra*) is a non-venomous snake endemic to southern California with bands of black, red, and cream. It is most common in the chaparral of the Santa Monica Mountains in Los Angeles County. Individuals can be found in Jeffery pine forest and, more commonly, in riparian corridors at lower elevations. They become active in March and are diurnal, though rarely seen. They feed primarily on fence lizards and skinks. Adult females lay eggs, which hatch in late summer. Loss of habitat from firewood collectors and collection for the pet trade has resulted in a decline in populations.

Coast horned lizard

BLM-S, CDFW-SSC

The coast horned lizard (*Phrynosoma blainvillii*) is a medium-sized lizard that relies on camouflage for protection. Its historic range in California extended along the Pacific coast west of the deserts of the Sierra Nevada. This range has been severely fragmented due to urbanization. They are most active in the summer and inhabit open areas of sandy soil and low-growing vegetation in semiarid mountains, valleys, and foothills. Individuals utilize sandy soils and require a supply of red harvester ants (*Pogonomyrmex barbatus*). Though the red harvester ant is their primary food source, they eat a diverse number of insect groups. Horned lizards do not move great distances during their lifetime. Adult females lay eggs in the spring, which hatch in the summer. Juveniles mature in two to three years. Predators include snakes, shrikes, burrowing owls, roadrunners, hawks, and domestic cats.

Mojave desert tortoise

ESA-T, ESA-CH, CA-T

The Mojave desert tortoise (*Gopherus agassizii*) is a keystone species in the Mojave Desert. Individuals are limited to saltbush, creosote bush scrub, and Joshua tree woodland habitat in the Mojave Desert and are found in Los Angeles County. They dig burrows which are used by many other species in their habitat. They feed primarily on wildflowers but will eat some dried annuals and perennials and cacti when nothing else is available. Threats to this species are from loss of habitat, food competition with cattle, introduction of new diseases, degradation of habitat, collection as pets, and an increase in juvenile predation by the introduction of ravens into the desert habitat.

Rosy boa**USFS-S**

The rosy boa (*Charina trivirgata*) occurs in coastal southern California. They spend most of their time under granitic rocks or within crevices. They are an ambush predator that feeds on small rodents. They are diurnal, with most activity occurring in the morning and dusk during hot summer days. Although populations are fairly stable, threats include loss to birds of prey, roads, and urban development.

San Bernardino ringneck snake**USFS-S**

San Bernardino ringneck snake (*Diadophis punctatus modestus*) is a small snake that is gray above and bright orange and yellow below, with orange around its neck. This subspecies is endemic to California, found along the southern California coast and inland into the San Bernardino Mountains. Habitat includes moist situations in varied habitat, including forests, grassland, rocky woodland, hillsides, chaparral, and upland desert along streams. Individuals are found from sea level to 7,000 feet. Ringneck snakes eat earthworms, slugs, small salamanders, lizards, and newborn snakes. They are secretive, most often seen under flat rocks, logs, or loose bark of dead trees.

Western pond turtle**BLM-S, USFS-S, CDFW-SSC**

The western pond turtle (*Emys marmorata*) is found along the Pacific states in the United States. Individuals are found in ponds, lakes, rivers, streams, creeks, etc. with abundant vegetation and rocky or muddy bottoms. These inhabited water bodies are typically in woodland, forest, and grassland areas. Individuals are aquatic, with the exception of adult females during egg-laying. They lay eggs in upland areas, sometimes traveling over a mile in uplands at night to lay their eggs. They lay clutches of one to 13 eggs which take 75 to 80 days to hatch. Adults eat aquatic organisms, carrion, algae, and lily pad pods.

Two-striped garter snake**BLM-S, USFS-S, CDFW-SSC**

The two-striped garter snake (*Thamnophis hammondi*) is native to southern and central California. It is found in coastal sage scrub, oak woodlands and Jeffrey pine forests near permanent fresh water and rocky areas. Threats to this species include loss of habitat and degradation of aquatic habitat. Other factors are livestock grazing, flood control, loss of food supply, and predation by domestic animals.

Amphibians**Arroyo Toad****ESA-E, ESA-CH, CDFW-SSC**

The arroyo toad (*Anaxyrus californicus*) is a small toad that occurs in gravelly streams with a lot of bare sandy ground and willows on the edges. For breeding, the arroyo toad is restricted to rivers and streams of low stream gradient with permanent water. Breeding occurs along the edges and within the streams in small, shallow, gravelly pools adjacent to sandy terraces. The terraces must be stable and contain moderately developed vegetation. Trees usually consist of sycamore and cottonwood. The toads will disperse into upland habitat with sandy soils such as coastal sage scrub and chaparral.

Coast Range newt

Coast Range newts (*Taricha torosa*) live in coastal southern California and spend much of their time outside breeding season in rocks, crevices, and under logs. They have toxic skin, resulting in few predators. They eat worms, snails, slugs, insects in the rotting logs, and aquatic invertebrates. Populations have declined due to loss of coastal streams and introduction of mosquitofish and red crayfish.

California red-legged frog**ESA–T, ESA–CH, CDFW–SSC**

California red-legged frog (*Rana draytonii*) is a small frog of coastal streams of southern California. It has been eliminated from 70 percent of its range. It is active in the daytime and lives in dense, shrubby, or emergent riparian vegetation and still or slow-moving perennial and ephemeral waterbodies that also serve as breeding sites.

San Gabriel slender salamander**USFS–S**

San Gabriel slender salamander (*Batrachoseps gabrieli*) is a small reddish-brown and black-flecked salamander that is found from 11 locations in the San Gabriel River system. It has been found under rocks, wood, or fern fronds on a steep north-west-facing talus slope shaded by *Quercus chrysolepis* and *Pseudotsuga macrocarpa*, on soil along Soldier Creek at the base of the talus slope, and under rocks and logs up to 10 to 15 meters from the stream in Rockbound Canyon.

Southern mountain yellow-legged frog**ESA–E, ESA–CH, CA–E, CDFW–SSC**

The southern mountain yellow-legged frog (*Rana muscosa*) is found in the local mountains south of the King's River. It occurs at sources of permanent water such as streams, lakes, and ponds between 1,200 and 7,500 feet in elevation. It basks in sunny locations. It has been eliminated from over 90 percent of its known range. Its main food is insects. Threats include introduction of a new fungus, loss of habitat, introduction of fish into ponds, livestock grazing, and pesticides.

Western spadefoot toad**BLM–S, CDFW–SSC**

Western spadefoot toad (*Spea hammondi*) is a small, spotted toad with a historic range of coastal Los Angeles County. They are most commonly associated with grasslands and vernal pools but are also found in coastal sage scrub and chaparral. Existing populations are primarily in the Santa Clarita area. They are highly terrestrial but require water to breed. Sufficient upland habitat exists, but adjacent wetland habitat has been eliminated in most areas; also, predators of the tadpoles are common in many of the urban wetlands that still exist.

Yellow-blotched salamander**BLM–S, USFS–S, CDFW–SSC**

Yellow-blotched salamander (*Ensatina eschscholtzii croceator*) is a large, brown and yellow salamander of south-central California. They inhabit cool, moist places under debris soil or near water, especially in places with a thick layer of leaf litter. They inhabit white fir, Jeffrey pine forest, oak woodland, and

chaparral. They are most common in rocky areas with many springs, moist soil, and plenty of shrub cover. Fire can be catastrophic in killing individuals and eliminating habitat in old-growth forests. The yellow-blotched salamander is most active after rains, eating insects, snails, and arthropods. Their main predators are jays and garter snakes. They remain only in the Santa Monica-Santa Susana-San Gabriel Mountains in Los Angeles County.

Fish

Unarmored threespine stickleback

ESA–E, CA–E, CDFW–FP

The unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*) is a fish limited to the permanent pools in the Santa Clara River system. It is a bottom-feeder and primarily eats invertebrate larvae. Its range expands after winter rains when streams increase their flows.

Invertebrates

El Segundo Blue Butterfly

ESA–E

The El Segundo blue butterfly (*Euphilotes battoides allyni*) was nearly extinct due to loss of coastal dune habitat and its larval host plant and adult nectar plant, *Eriogonum parvifolium*. The larvae feed on the flowers for one month before pupating. Adults hatch from their cocoon in the summer and live only a few days.

Monarch butterfly (California overwintering population)

ESA–Pet, USFS–S

The monarch butterfly (*Danaus plexippus*) is a brightly colored, large, black and orange butterfly. The larvae are poisonous when they feed on the toxic milkweed plant (*Asclepias* spp.). Its alternate food source is fennel (*Foeniculum vulgare*), which is not toxic. The butterfly migrates from Mexico toward Canada each year and overwinters on specific trees along the route. During migration they also roost at night in small clusters. The loss of roost trees, predation, and the loss of milkweed plants along the migration route have resulted in a large drop in population.

Palos Verdes blue butterfly

ESA–E, ESA–CH

The Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*) is a small blue and gray butterfly. This species is limited to the Palos Verdes Peninsula area. The larval host plant is a very rare milk-vetch. Presumably due to the lack of adequate host plants, a new population of the species discovered at a defense site in San Pedro in 1994 has switched to a much more common legume species, deerweed (*Acmispon glaber* [*Lotus scoparius*]).

Plants

Abrams' oxytheca

USFS-S, CNPS-1B.2

The Abrams' oxytheca (*Acanthoscyphus parishii* var. *abramsii*) is a prostrate, pink-flowered spineflower relative. It is found only in the San Gabriel Mountains in Los Angeles County. It occurs in sandy and gravelly soils in between 5,500 and 6,500 feet in elevation.

Conejo dudleya

ESA-T, CNPS-1B.2

The Conejo dudleya (*Dudleya parva*) is a small succulent-leaved perennial with yellow flowers and red flowering stems. It is found in chaparral, Jeffery pine forest, foothill woodlands, and cliffs of the Santa Monica Mountains. Only one historic collection is recorded in Los Angeles County.

Alkali mariposa-lily

BLM-S, USFS-S, CNPS-1B.2

The alkali mariposa lily (*Calochortus striatus*) is a pink-flowered bulb of saltbush scrub occurring on the floor of the Antelope Valley. It is identified by the dark lines in the petals which are missing in *C. palmeri*. It is most common in clay drainages but occurs in dunes on top of clay pans adjacent to dry lakebeds.

Aphanisma

CNPS-1B.2

The aphanisma (*Aphanisma blitoides*) is a succulent annual goosefoot that turns red late in the growing season. Its primary habitat is coastal bluffs, which have been almost entirely impacted by development. It can occur in specific habitats within coastal sage scrub and undisturbed beaches. It can also occur in disturbed areas, especially ditches.

Beach spectaclepod

BLM-S, CA-T, CNPS-1B.1

The beach spectaclepod (*Dithyrea maritima*) is primarily a Channel Island species of sand dunes. It once occurred on the mainland at Seal Beach, Playa Del Rey, and Redondo Beach. It still occurs in the dunes from Ventura to San Luis Obispo where less disturbance has occurred. It is a rough-leaved mustard with cream colored flowers and twin round shaped fruits.

Big Bear Valley woollypod

CNPS-1B.2

The Big Bear Valley woollypod (*Astragalus leucolobus*) is a member of a genus with a large number of rare species. While this species occurs in Jeffery pine forests and pinyon-juniper woodlands, it is specifically known as a "pebble plains" species. This refers to a distinctive clay soil with numerous rounded cobbles which occurs adjacent to Baldwin Lake.

Blochman's dudleya

CNPS-1B.1

The Blochman's dudleya (*Dudleya blochmaniae* ssp. *blochmaniae*) is a tiny, corm-like, succulent-leaved perennial that grows on coastal bluffs in sandy habitats. Only one historic location in Los Angeles County was recorded at Winters Canyon in Malibu in 1948 (just south of Pepperdine University).



CNPS–1B.1

Brand's star phacelia

The Brand's star phacelia (*Phacelia stellaris*) is native to coastal sage scrub and beach dunes on the coast of southern California and Baja California, where it is known from only a few occurrences. Its status is uncertain, as most of its recorded occurrences are in areas that have since been disturbed or degraded in the highly developed coastal region. Populations around San Diego and along the Santa Ana River have been confirmed. All collections in Los Angeles County are historic records in urbanized areas.

Braunton's milk-vetch

ESA–E, ESA–CH, CNPS–1B.1

The Braunton's milk-vetch (*Astragalus brauntonii*) is a large white- to purple-flowered, 1- to 2-foot-tall perennial. It is most common after fires in chaparral. It will persist in bare areas, especially with carbonate bedrock. It also grows on the edges of roadsides and fuel breaks. Potential habitat for this species occurs at Green Mountain in the Santa Monica Mountains.

California Orcutt grass

ESA–E, CA–E, CNPS–1B.1

The California Orcutt grass (*Orcuttia californica*) occurs locally in large vernal pools from coastal and central California. Vernal pools historically occurred in depressions in most grassland. This plant community has been converted to urban development and agriculture; in undeveloped areas, it has been subject to overgrazing and introduction of nonnative grasses.

California satintail

USFS–S, CNPS–2B.1

The California satintail (*Imperata brevifolia*) is a large bunchgrass that grows in riparian areas in coastal sage scrub. It has a wide range but locally is found in the foothills of the San Gabriel Mountains in Los Angeles County. Its presence in California is a relic of a wetter past.

California saw-grass

USFS–S, CNPS–2B.2

The California saw-grass (*Cladium californicum*) is a grass-like perennial of alkali sinks, freshwater marshes, and other wetlands. Only one historic collection is recorded in Los Angeles County from the San Gabriel River drainage above the San Gabriel Reservoir. It is known from only 11 extant populations in the state but also occurs in Mexico.

Catalina crossosoma

CNPS–1B.2

The Catalina crossosoma (*Crossosoma californicum*) is a cream-flowered shrub with distinctive fruits. It is most common on the Channel Islands but rarely occurs on the mainland in mesic canyons in chaparral and bluff scrub. Its range does not extend far from the coast onto the mainland.

California dissanthelium

CNPS–1B.2

The California dissanthelium (*Dissanthelium californicum*) is a small annual grass found in mesic bare areas in coastal sage scrub on Catalina Island. Once thought to be extinct, it reappeared after the nonnative herbivores were removed from the island. It is most common in high rainfall years.

**Catalina Island dudleya****CNPS–1B.2**

The Catalina Island dudleya (*Dudleya virens* ssp. *hassei*) is endemic to Santa Catalina Island on coastal bluffs. A historic collection is known from San Pedro on the mainland. Known from 10 populations, its numbers and distribution were historically reduced by goats.

Chaparral ragwort**CNPS–2B.2**

The chaparral ragwort (*Senecio aphanactis*) is a small, erect yellow-flowering composite with a wide range in the state. All Los Angeles collections are old, and the species may no longer occur in the county. It has been observed at Puddingstone, Santa Catalina Island, and Saugus.

Chickweed oxytheca**USFS-S, BLM-S, CNPS 4.3**

Chickweed oxytheca (*Sidotheca caryophylloides*) is a prostrate, white-flowered annual of the San Gabriel Mountains. It is rare in sandy soils in Jeffery pine forest. It has rarely been collected and is not well tracked because it is a List 4 CNPS species.

Club-haired mariposa-lily**USFS-S, CNPS–4.3**

The club-haired mariposa-lily (*Calochortus clavatus* var. *clavatus*) is a yellow-flowered bulb common from western Los Angeles County and the eastern San Gabriel Mountains. It occurs in grasslands and openings in coastal sage scrub. It has taller stems than the other southern California subspecies and has zig-zag stems. The purple lines, hairs, and stamens are quite variable in color, ranging from mostly purple to almost no purple.

Coast woolly-heads**CNPS–1B.2**

The coast woolly-heads (*Nemacaulis denudata* var. *denudata*) was a fairly common prostrate annual in undisturbed sand dunes. It is found only on sandy banks of streams in Orange County today. It once occurred in the Long Beach area.

Coastal dunes milk-vetch**ESA–E, CA–E, CNPS–1B.1**

The coastal dunes milk-vetch (*Astragalus tener* var. *titi*) is limited to coastal dune habitat and sandy areas in the coastal sage scrub. It is presently known only from coastal terrace grassland at Pebble Beach in Monterey County. It is a small annual herb whose population levels vary with rainfall. It has not been observed in Los Angeles County in nearly 100 years due to the destruction of all habitat. It once occurred near Marina Del Rey and Santa Monica; both areas had extensive wetlands in the past. It probably preferred mesic sites behind dunes but also occurred on foredunes.

Coulter's goldfields**BLM–S, CNPS–1B.1**

Coulter's goldfields (*Lasthenia glabrata* var. *coulteri*) occurs in mesic sites in grasslands such as coastal marshes, alkali sinks, riparian, and vernal pools. Historically, it occurred at very scattered locations in Los

Angeles County. It could occur in compacted soils along rights-of-way at elevations as high as Jeffery pine forest.

Coulter's saltbush**CNPS 1.2B**

Coulter's saltbush (*Atriplex coulteri*) is a prostrate annual with inconspicuous flowers. It grows in the coastal strand, coastal annual grasslands, and coastal sage scrub and occasionally inland in alkaline valleys and river systems. It occurs on the Palos Verdes Peninsula and Catalina Island in Los Angeles County.

Davidson's bush-mallow**CNPS-1B.2**

Davidson's bush-mallow (*Malacothamnus davidsonii*) is a hairy-leaved, pink-flowered shrub that grows in chaparral and coastal sage scrub.

Davidson's saltscale**CNPS-1B.2**

Davidson's saltscale (*Atriplex serenana* var. *davidsonii*) is a low-growing perennial with erect, lanceolate, gray leaves. It occurs on coastal bluff scrub, valley grassland, and some habitats in coastal sage scrub. It occurred historically in Malibu Canyon, Mesmer (historic name for the location along the original Los Angeles River upstream of the Ballona wetlands), Los Angeles at Temple Street, and on Catalina Island.

Decumbent goldenbush**CNPS-1B.2**

Decumbent goldenbush (*Isocoma menziesii* var. *decumbens*) historically occurred in coastal riparian areas. The only mainland historic site in Los Angeles County is a collection from Terminal Island. Otherwise it occurs on the Channel Islands. The genus and species is the most common summer-blooming shrub in Los Angeles County; the subspecies is rare.

Estuary seablite**CNPS-1B.2**

Estuary seablite (*Suaeda esteroa*) is a yellow-green amaranth with succulent leaves and stems. It is found in salt marshes along the coast and inland in brackish water on major creeks. Most sites in Los Angeles County are historic, such as Long Beach, San Pedro, and Ballona wetlands.

Forest Camp sandwort**USFS-S**

Forest Camp sandwort (*Eremogone macradenia* var. *arcuifolia*) is a cream-flowered perennial with needle-like leaves. It is from the desert side of the San Gabriel Mountains, primarily from the Liebre Mountain area.

Gambel's water cress**ESA-E, CA-T, CNPS-1B.1**

Gambel's water cress (*Nasturtium gambelii*) occurs along uncontaminated streams and lake edges. It formerly occurred at La Cienega in Santa Monica. This swamp resulted from the original flow of the Los Angeles River; this habitat no longer exists. The Los Angeles River now empties into the Pacific Ocean in



Long Beach. Its course changed in 1825 due to a flood and an earthquake. La Cienega was a depression at the headwaters of Ballona Creek which empties into Playa Del Rey, and the Ballona wetlands are all that remains of the native vegetation.

Greata's aster**BLM-S, CNPS-1B.3**

Greata's aster (*Symphotrichum greatae*) is a white-flowering perennial daisy of wet habitats in the San Gabriel Mountains. It is primarily found in the San Gabriel River drainage.

Grey-leaved violet**CNPS-1B.3**

The grey-leaved violet (*Viola pinetorum* var. *grisea*) is a yellow-flowered perennial found on dry rocky slopes in pinyon-juniper woodland and Jeffrey pine forests. It has the potential to occur in any of the mountaintop sites. Although it is listed in the county only from Vincent Gap, it has been observed at the top of the Cajon Pass and in mountain ranges to the east of Los Angeles County.

Hall's monardella**USFS-S, CNPS-1B.3**

Hall's monardella (*Monardella macrantha* ssp. *hallii*) is a prostrate, red-flowered perennial that grows under the pine needles in Jeffrey pine forest, primarily in San Diego and Baja California. It has been collected on the road between Sunset Ridge and Sunset Peak in Los Angeles County.

Interior manzanita**USFS-S**

Interior manzanita (*Arctostaphylos parryana* var. *tumescens*) is a 3- to 4-foot-tall shrub with pink flowers. It is found in montane chaparral and Jeffrey pine forest and red fir forest. It is difficult to identify from the other low-growing manzanitas in the San Gabriel Mountains.

Intermediate mariposa-lily**USFS-S, CNPS-1B.2**

The intermediate mariposa-lily (*Calochortus weedii* var. *intermedius*) is a hybrid between two local species: *C. weedii* and *C. plummerae*. Being intermediate in character, the flower color is highly variable. Plant key guides do not include all the hybrid individuals that are nearly all one species or the other. The hybrids are centered in the Tonner Canyon area. This species grows in the grasslands of the oak woodland-chaparral-coastal sage scrub mosaic between Bell and Dayton canyons.

Island green dudleya**CNPS-1B.2**

Island green dudleya (*Dudleya virens* ssp. *insularis*) is a leaf succulent perennial from the Channel Islands. Mainland sites include the cliffs at Point Vincente and Palos Verdes. It occurs on rocky hillsides on north-facing slopes, canyons, and stream banks. The leaves are unusually cylindrical.

Island rush-rose**ESA-T, CNPS-1B.2**

Island rush-rose (*Crocانthemum greenei*) is a short-lived, perennial, yellow-flowering subshrub. This species became extremely rare due to the extensive overgrazing by introduced animals on the Channel

Islands. It is a fire follower, returning after fires from a seed stock in the soils. Until 2007, one to three known plants occurred on Catalina Island, including a location on Blackjack Mountain. The plants were caged to eliminate deer grazing, which lowers plant health and eliminates seed production. As many as 4,000 plants germinated and survived after a fire. It is not known if germination will occur in a wet year without a fire and with bison still on the island.

Late-flowered mariposa-lily**BLM–S, USFS–S, CNPS–1B.2**

The late-flowered mariposa-lily (*Calochortus fimbriatus*) is a pale purple-flowered bulb that occurs only in the Santa Susana Mountains–Newhall area in Los Angeles County. The flower color and shape is highly variable. It is known from 89 populations, often in serpentine soils in chaparral and oak woodland. It is threatened by habitat degradation from overgrazing, fire suppression, and the introduction of nonnative annuals.

Lemon lily**USFS–S, CNPS–1B.2**

The lemon lily (*Lilium parryi*) is a tall perennial with large, yellow flowers. It grows in wet meadows and streams. This plant is obvious when present and extremely limited in habitat. In California it occurs only in the Peninsular and Transverse ranges.

Los Angeles sunflower**CNPS–1A**

The Los Angeles sunflower (*Helianthus inexpectus*) is known from one recent location along the Santa Clara River at Newhall Ranch. Most sunflowers are tall, yellow-flowered annuals with a wide geographic range. The rare perennials found in wet areas have turned out to be hybrid species. It is a polyploidy species but the parents of the *H. nuttallii parishii* are unknown because it is extinct. The hybrid/polyploid populations may have different maternal parents or hybridize at different times, causing genetic differences in each population; this causes difficulties in taxonomy.

Lyon’s pentachaeta**ESA–E, ESA–CH, CA–E, CNPS–1B.1**

Lyon’s pentachaeta pygmy daisy (*Pentachaeta lyonii*) is a 1- to 3-inch-tall yellow-flowering annual daisy. The plant is found on soils that limit the competition with nonnative annuals. This species occurs in native grasslands with clay soils or macrobiotic crust. It is most common in swales. Populations are centered in the coastal Ventura County area including the northern Santa Monica Mountains in Los Angeles County. It was more common in the Channel Islands before heavy grazing damaged the habitat.

Many-stemmed dudleya**BLM–S, USFS–S, CNPS–1B.2**

The many-stemmed dudleya (*Dudleya multicaulis*) grows primarily on cliffs and steep canyon slopes at Marshall Canyon, Puddingstone, Santa Monica, Azusa and Dalton canyons, Elephant Hill, and Pelican Hill.

Marcescent dudleya**ESA–T, CA–R, CNPS–1B.2**

The marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*) is a leaf-succulent with shorter, broader leaves than the common dudleya species. It has yellow flowers, red stems, and red calyxes. This species' best quality habitat is north-facing rocky cliffs with a permanent stream flow on the canyon floor. It can occur on shaded, rocky slopes and narrow canyons and is limited to the northern Santa Monica Mountains.

Marsh sandwort**ESA–E, CA–E, CNPS–1B.1**

The marsh sandwort (*Arenaria paludicola*) is a cream-flowered perennial of wet, marshy areas in bogs and freshwater marshes. It is at risk due to loss of wetland habitat and degradation of water quality. Only one naturally occurring population of marsh sandwort is known to remain in California at Oso Flaco Lake in San Luis Obispo County. A historic collection from Cienega in Los Angeles County is dated in 1900. Presently, Los Angeles County has no habitat for this species.

Mason's neststraw**BLM–S, USFS–S, CNPS–1B.1**

Mason's neststraw (*Stylocline masonii*) is a minute, gray annual without showy flowers. The group is difficult to identify and has been collected only in the Santa Clara wash system in Los Angeles County. Much of its potential habitat has been converted to agriculture. It was probably primarily an inland valley species; it is now extremely rare.

Mesa horkelia**USFS–S, CNPS–1B.1**

The mesa horkelia (*Horkelia cuneata* var. *puberula*) is a cream-colored flowering perennial found from mesic grasslands up to Jeffrey pine forests. Its primary habitat is mesic depressions and stream-sides on grassy banks. In Los Angeles County it occurs in canyons in the San Gabriel Mountains and once occurred in coastal grasslands in El Segundo, Point Dume, Palos Verdes, and Los Angeles. It occurs primarily in the Santa Ana Mountains of Orange County and the San Bernardino Mountains.

Mt. Gleason Paintbrush**USFS–S, CNPS 1B.2**

Mt. Gleason paintbrush (*Castilleja pruinosa* [*gleasonii*]) is a red-flowered, partially parasitic perennial of the higher elevations of the eastern San Gabriel Mountains. It is much more common in Northern California. The leaves are densely hairy and turn gray with age.

Nevin's barberry**ESA–E, ESA–CH, CA–E, CNPS–1B.1**

Nevin's barberry (*Berberis nevinii*) is a yellow-flowering shrub with distinctive holly-like leaves and fleshy red fruit. It normally grows in gravelly washes with an overstory of sycamore and cottonwood. It can grow in washes with alluvial scrub or on adjacent wash bench slopes. It curiously also occurs on hilltops and rocky cliffs in the southern portion of its range. It propagates easily in cultivation but has not been observed setting fruit in the wild. Some of the populations may have been planted as part of early restoration projects.

**Nevin's woolly sunflower****CNPS-1B.3**

Nevin's woolly sunflower (*Constancea nevinii*) is a yellow-flowering, gray-leaved perennial of the Channel Islands. It has finely divided leaves and flat-topped clusters of yellow flowers. It grows in coastal bluff scrub and coastal sage scrub and is known from 48 populations which are recovering from grazing by feral goats.

Orcutt's linanthus**BLM-S, USFS-S, CNPS-1B.3**

Orcutt's linanthus (*Linanthus orcuttii*) is an erect white- to pink-flowered annual. Plants are shorter and flowers larger than the San Gabriel linanthus. It is found in chaparral and Jeffery pine forests. It has not been documented in Los Angeles County from modern collections.

Palmer's mariposa-lily**BLM-S, USFS-S, CNPS-1B.2**

Palmer's mariposa-lily (*Calochortus palmeri* var. *palmeri*) is a pink-flowered bulb that occurs at Sag Ponds along the San Andreas Fault and seeps, springs, and streams in the San Gabriel Mountains. It is threatened by development, grazing, nonnative plants, recreational activities, and vehicles. It is known from 92 populations.

Parish's brittlescale**USFS-S, CNPS-1B.1**

Parish's brittlescale (*Atriplex parishii*) is a small, gray-leaved, prostrate annual of vernal pools, alkaline areas, and saline depressions. It is associated with the coast and river systems in southern and central California. The only historic location in Los Angeles County is from Bixby Knolls near Long Beach.

Parish's gooseberry**CNPS-1A**

Parish's gooseberry (*Ribes divaricatum* var. *parishii*) was historically collected once and then thought to be extinct. It has been collected in the Rio Hondo/Whittier Narrows area in recent times but has not been observed during the recent drought. Historic occurrences are recorded from Pasadena.

Parry's spineflower**BLM-S, USFS-S, CNPS-1B.1**

Parry's spineflower (*Chorizanthe parryi* var. *parryi*) is more common and has a wider range than other subspecies of this species. It is limited to sandy or rocky openings in chaparral, cismontane woodland, coastal scrub, or valley and foothill grasslands of Los Angeles, Riverside, San Bernardino, and Ventura counties in California.

Peirson's lupine**USFS-S, CNPS-1B.3**

Peirson's lupine (*Lupinus peirsonii*) primarily occurs in the San Gabriel Mountains from the crest of the main ridge to washes on the desert side near the base in the Mojave Desert. It can be easily identified because it is the only yellow-flowered perennial lupine in the area; most perennial lupines in the area are purple-flowered.



USFS-S

Peirson's spring beauty

Peirson's spring beauty (*Claytonia lanceolata* var. *peirsonii*) is a white-flowering perennial that occurs in Jeffery pine forest in the San Gabriel Mountains. It occurs in Lodgepole Forest, Subalpine Forest, Red Fir Forest, and wetland-riparian. It can occur in dry, rocky slopes or wet meadows. It is known from a couple of collections in the San Gabriel Mountains.

Robbins' nemacladus

USFS-S, CNPS-1B.2

Robbins' nemacladus (*Nemacladus secundiflorus* var. *robbinsii*) is a minute cream-flowered annual. The collections in Los Angeles County are from non-related habitats, indicating this plant can be found along the coast, in the mountains, and in the desert. In general, the group likes sandy habitat and are commonly only about 2 inches tall, and nearly invisible, when the observer is standing. Many taxa remain undescribed in this poorly understood and under-collected genus. This species has irregular cream-colored flowers lacking purple markings.

Robinson's pepper-grass

CNPS-4.3

Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*) is most common in Los Angeles County in the foothills of the San Gabriel Mountains but has been collected in the Verdugo and Puente hills. It also occurs on the Channel Islands. It is most commonly found on bare slopes between shrubs in coastal sage scrub and chaparral.

Rock Creek broomrape

USFS-S, CNPS-1B.2

Rock Creek broomrape (*Orobanche valida* ssp. *valida*) is a parasitic perennial that parasitizes silk tassel bush (*Garrya elliptica*). The only visible portion of the plant is the flower stalk, which can remain visible for several years. It is found in the yellow pine forests of the San Gabriel Mountains.

Ross' pitcher sage

USFS-S, CNPS-1B.2

Ross' pitcher sage (*Lepechinia rossii*) is a showy, pink-flowered shrub with a very limited range in the Liebre Mountains area. It usually occurs in canyons in oak woodland and chaparral. It is most common in openings on north-facing slopes in soils derived from reddish marine sediment. It commonly occurs after fires and in areas disturbed for road cuts and fuel breaks.

Round-leaved filaree

BLM-S, CNPS-1B.1

Round-leaved filaree (*California macrophylla*) is a white-flowered geranium of valley grassland and foothill woodland habitat. It can grow in depressions and clay flats along roadsides. Once widespread throughout coastal and central California and the Channel Islands, today it is most common in the Malibu Creek to Newhall area.

Salt marsh bird's-beak**ESA–E, CA–E, CNPS–1B.2**

Salt marsh bird's-beak (*Chloropyron maritimum* ssp. *maritimum*) is a species found in moist, alkaline environments. It is an erect paintbrush-type semi-parasite that forms host-plant relationships with most salt marsh species, such as saltgrass (*Distichlis spicata*) and pickleweed (*Salicornia* spp.).

Salt Spring checkerbloom**USFS–S, CNPS–2B.2**

Salt Spring checkerbloom (*Sidalcea neomexicana*) is a pink-flowered perennial in the Mallow family. Most collections in Los Angeles County are historic, with one modern collection in La Cañada. It has a widespread range and usually occurs at alkaline springs and seeps from 14 sites in California.

San Antonio milk-vetch**USFS–S, CNPS–1B.3**

San Antonio milk-vetch (*Astragalus lentiginosus* var. *antonius*) is a narrow-leaved, nearly prostrate, blue- to purple-flowered species that occurs in upper-elevation pine forests. It occurs on the dry slopes and has been collected several times on Table Mountain.

San Bernardino aster**BLM–S, USFS–S, CNPS–1B.2**

San Bernardino aster (*Symphyotrichum defoliatum*) is a purple-flowered perennial daisy. Scattered throughout southern California, it is associated with major river systems. Most collections in Los Angeles are historic.

San Bernardino grass-of-Parnassus**USFS–S, CNPS–1B.3**

San Bernardino grass-of-Parnassus (*Parnassia cirrata* var. *cirrata*) a small, white-flowered perennial of moist meadows and stream sides in Jeffrey pine forest. It was only collected once in Los Angeles County in the San Gabriel River drainage.

San Fernando Valley spineflower**ESA–C, CA–E, USFS–S, CNPS–1B.1**

San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*) is a prostrate, white-flowered annual that was thought to be limited to large wash systems. It presumed to be extinct, as those washes were disturbed for urbanization and sand mining. This species was rediscovered, however, in Newhall in shallow soils with exposed bedrock.

San Gabriel bedstraw**BLM–S, USFS–S, CNPS–1B.2**

The San Gabriel bedstraw (*Galium grande*) is a shrub easily identified to genus but difficult to identify to species. It occurs at the upper elevations of the San Gabriel Mountains from chaparral to Jeffrey pine forest. It is distinguished by the plants being sprawling and hairy throughout, the leaves widely elliptical, and the flowers yellow.

San Gabriel Mountains sunflower**USFS-S CNPS 4**

San Gabriel Mountains sunflower (*Hulsea vestita* ssp. *gabrielensis*) is a yellow-orange flowered perennial of mountaintops in the San Gabriel Mountains, including at Magic Mountain. It grows in Jeffery Pine, Red Fir, and Lodgepole pine forest.

San Gabriel linanthus**USFS-S, CNPS-1B.2**

San Gabriel linanthus (*Linanthus concinnus*) is an erect, white-flowered annual that occurs in chaparral and Jeffery and red fir forest in the San Gabriel Mountains. It occurs in sandy openings in rocky areas.

San Gabriel River dudleya**USFS-S CNPS 1B.2**

The San Gabriel River dudleya (*Dudleya cymosa* ssp. *crebrifolia*) is a small reddish and yellow flowering leaf succulent. It is limited to canyons of the San Gabriel River drainage. It occurs on steep, north-facing cliffs for a linear length of about 1 mile.

Santa Barbara morning-glory**CNPS-1A**

Santa Barbara morning-glory (*Calystegia sepium* ssp. *binghamiae*) was once considered extinct. Its historical occurrences were based on only a few, mostly coastal, collections. It was rediscovered near one of its historic locations in Chino, California. It has not been rediscovered in Los Angeles County

Santa Catalina Island desert-thorn**CNPS-1B.1**

Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hassei*) is a purple-flowered, shrubby boxthorn that occurs on Catalina Island and the Palos Verdes Peninsula. Its branching pattern and spines are distinctive even when its leaves or flowers are absent.

Santa Catalina figwort**CNPS-1B.2**

The Santa Catalina figwort (*Scrophularia villosa*) is a red- and yellow-flowered, strongly scented perennial found only in the Channel Islands. It occurs in mesic habitats in coastal sage scrub and chaparral, primarily on north-facing slopes and in narrow shady canyons. It is threatened by habitat loss and degradation from feral herbivores.

Santa Catalina Island bedstraw**CDNP-1B.3**

Santa Catalina Island bedstraw (*Galium catalinense* ssp. *catalinense*) is a cream-flowered shrub that grows on the rocky slopes and coastal bluffs of Catalina Island. It has suffered from overgrazing by goats, which has resulted in a loss of genetic diversity.

Santa Catalina Island currant**CNPS-1B.2**

Santa Catalina Island currant (*Ribes viburnifolium*) is a low-growing shrub used in the native ornamental trade. Because of over-grazing by goats and deer, populations are much smaller than in the past.



Presently, this species is found in narrow, mesic canyons and shady, north-facing slopes. It has been collected on the east-northeastern slopes of Black Jack Peak.

Santa Catalina Island ironwood**CNPS–1B.2**

Santa Catalina Island ironwood (*Lyonothamnus floribundus* ssp. *floribundus*) is a very distinctive tree species that occurs only on the Channel Islands and in canyons on the Tenaja Truck trail off of Highway 74. As this plant grows easily in cultivation, mainland observations may be ornamentals. On Catalina Island, it occurs only on north-facing slopes at the highest elevations. Historic deer and goat grazing has eliminated plant reproduction for many years.

Santa Catalina Island manzanita**CNPS–1B.2**

Santa Catalina Island manzanita (*Arctostaphylos catalinae*) is a white-flowered shrub that reaches up to 16 feet in height. It is limited to nine populations on Santa Catalina and Santa Cruz Island. It occurs on ridges in chaparral.

Santa Cruz Island winged-rockcress**ESA–E, CNPS–1B.1**

Santa Cruz Island winged-rockcress (*Sibara filifolia*) is a small, annual, purple-flowered mustard. It grows in coastal sage scrub, preferring saddles between mountaintops on rocky ridges and shady areas. It was historically threatened by feral herbivores, including goats; about 500 individual plants in 4 populations existed when the goats were removed from the islands. Only one known population occurs on Santa Catalina Island.

Santa Monica dudleya**ESA–T, CNPS–1B.1**

Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*) is a succulent-leaved, rosette-forming perennial limited to the Santa Monica Mountains and Modjeska Canyon in Orange County. It occurs on shaded slopes of sedimentary and conglomerate rocks cliffs in oak and juniper woodlands. Two populations occur in Los Angeles County: one is Malibu Canyon and the other in Topanga Canyon.

Santa Susana tarplant**CA–R, BLM–S, CNPS–1B.2**

Santa Susana tarplant (*Deinandra minthornii*) is a perennial, yellow-flowering, summer-blooming, rounded shrub. It has a very limited range in the Santa Susana Mountains, with a few scattered plants in the Santa Monica Mountains, on rocky slopes and sandstone crevices in coastal sage scrub and chaparral. No more than 20 populations are known.

Short-joint beavertail**BLM–S, USFS–S, CNPS–1B.2**

Short-joint beavertail (*Opuntia basilaris* var. *brachyclada*) is a variety of beavertail with 2-inch-long cylindrical (rather than flattened) pads that occurs from the desert side of Cajon Pass west to Lake Isabella. It occurs at intermediate elevations in desert chaparral and pinyon-juniper woodland. It is perennial and can be identified all year.

**Short-sepaled lewisia****USFS–S, CNPS–2B.2**

Short-sepaled lewisia (*Lewisia brachycalyx*) is a perennial of meadows and seeps in Jeffery pine forest of the San Gabriel Mountains.

Showy island snapdragon**CNPS–1B.2**

Showy island snapdragon (*Gambelia speciosa*) is now rare on the Channel Islands due to overgrazing. On the mainland, it is commonly grown as a native ornamental species.

Slender-horned spineflower**ESA–E, CA–E, CNPS–1B.1**

The slender-horned spineflower (*Dodecahema leptoceras*) is a tiny, prostrate, cream- and pink-flowered annual. It occurs on wash benches in major dry washes in the Riverside/San Fernando Valley areas. It is primarily found from the Cajon Pass to Redlands with scattered populations from northern Los Angeles County to southern Riverside County.

Slender mariposa-lily**BLM–S, USFS–S, CNPS–1B.2**

Slender mariposa-lily (*Calochortus clavatus* var. *gracilis*) is a yellow-flowered bulb of the grasslands in coastal sage scrub, oak woodland, and chaparral, especially along the southern base of the San Gabriel Mountains. It is most common in the Verdugo Mountain/Newhall area.

Sonoran maiden fern**USFS–S, CNPS–2B.2**

The Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*) is a perennial fern found in shady canyons of major drainage systems in the San Gabriel and Santa Monica mountains. In Los Angeles County, it is primarily found in the Glendora Canyon and Encinal Canyon areas. It can occur near springs, seeps, and meadows.

South coast saltscare**CNPS–1B.2**

The south coast saltscare (*Atriplex pacifica*) is a prostrate, red-stemmed annual with pointed-tipped leaves. It grows in alkaline clay pans adjacent to sea bluffs in native grasslands. It is associated with the sea coast and with river systems where habitat is nearly always disturbed. It historically occurred in the San Pedro Hills and on some of the Channel Islands.

Southern jewelflower**BLM–S, USFS–S, CNPS–1B.3**

The southern jewelflower (*Streptanthus campestris*) is an erect, purple-flowered mustard. It was collected once at Elizabeth Lake in Los Angeles County in 1986 but is more common in the San Bernardino Mountains. It grows in upper elevations in montane chaparral, oak woodlands, and Jeffery pine forests. It is a very rare plant; it is common for this genus to have species with very few locations.

**Southern Tarplant****CNPS-1B.1**

The southern tarplant (*Centromadia parryi* ssp. *australis*) is a widespread, yellow-flowering summer annual throughout coastal southern California. It is found especially in marshes, swamps, vernal pools, and grasslands. This species does well in disturbed areas.

Spreading navarretia**ESA-T, CNPS 1B.1**

Spreading navarretia (*Navarretia fossalis*) is a minute, white-flowered spineflower. It occurs at vernal pools, clay pans, and depressions. It occurs in the Santa Clarita area in Los Angeles County with historic locations at vernal pools in urbanized portions of Los Angeles Valley.

Thread-leaf Brodiaea**ESA-T CA-E, CNPS 1B.1**

Thread-leaf brodiaea (*Brodiaea filifolia*) is a clumping bulbous perennial with blue-purple flowers. It primarily occurs in Orange County, but a population occurs in the Claremont Wilderness Park and the foothills above Glendora. It occurs on slopes in coastal sage scrub.

Ventura Marsh milk-vetch**ESA-E, ESA-CH, CA-E, CNPS-1B.1**

The Ventura Marsh milkvetch (*Astragalus pycnostachyus* var. *lanosissimus*) is a large, coarse, gray-leaved perennial. Its habitat, the back dunes of a coastal dune system, has been eliminated in all but a small area on a military base in Oxnard. Its habitat is nonexistent in the rest of California, but it could be reestablished in restored dune areas such as the El Segundo Dunes. Its range is based on a couple of historic collections along the coast.

Wallace's nightshade**CNPS-1B.1**

Wallace's nightshade (*Solanum wallacei*) is a purple-flowered perennial with black berries. It occurs primarily on the Channel Islands in shaded canyons and hillsides, stream sides, beaches, and washes.

White rabbit-tobacco**CNPS-2B.2**

The white rabbit-tobacco (*Pseudognaphalium leucocephalum*) is a white-flowered, erect perennial that occurs in coastal sage scrub and chaparral in the coastal foothills of the San Gabriel Mountains. It has been observed in the past in the Santa Clarita, Verdugo Mountains, and Hollywood Hills.

White-veined monardella**CNPS-1B.3**

The white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*) is a pale purple perennial that occurs only in the chaparral of the Santa Monica Mountains in Los Angeles County.

Wiggins' cryptantha**CNPS-1B.2**

Wiggins' cryptantha (*Cryptantha wigginsii*) belongs to a large genus of annuals and perennials in which the species of the annuals is based primarily on the seed characteristics. This rare species has been confused with *C. clevelandii*, which had never been collected in the United States. Experts have



determined it is most common on Catalina Island, but it has been collected occasionally on the mainland. In general, it is a spring-flowering annual and would be most common in high rainfall years.

Woolly mountain-parsley

USFS–S, CNPS–1B.3

Woolly mountain-parsley (*Oreonana vestita*) is a minute perennial that is commonly found on mountaintops. It occurs in alpine fellfields, red fir, and subalpine forest. It occurs on rocky ridges and slopes of the eastern San Gabriel Mountains.

APPENDIX B-3

NOISE MODELING

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Noise Analysis Methods and Assumptions

The following summarizes the methods and assumptions for the analysis of potential short-term (construction) and long-term (operational) noise impacts from the proposed Project.

Short-Term (Construction Impacts)

As a worst case scenario, this analysis was based on a composite of activities at four representative sites. Construction activities are summarized in Table 14 (and Construction Noise Estimation) and include a list of likely types and number of pieces of construction equipment, as well as estimates of hours per day and the duration that each type of equipment would be in operation. Noise emissions measured as short-term noise exposures at 50 feet for the types of equipment to be used for the proposed Project were obtained from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) User's Guide (FHWA 2006). The noise emission reference levels are shown in Table 15 below.

Table 14: Summary of Construction Activities

Equipment Type	Specification (BHP)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Personnel and Tool Delivery						
F250 Antenna and Line Truck	306	1	0.067	30	30	Haul equipment.
F550 Civil Truck	306	1	0.067	30	30	Haul personnel.
Demolition						
Concrete Saw ²	81[27] ²	1	7	1	1	Break up existing concrete.
Mini Excavator	22.9	1	4	1	1	Cut and fill work.
Dump Truck	450	1	8	1	1	Haul off excess material.
2,000-gallon Water Truck	210	1	1	1	1	Dust control.
Site Preparation						
Mini Excavator	22.9	1	4	1	15	Cut and fill work.
Excavation						
Auger Drill Rig ²	205 [206] ²	1	3	1	2	Install fences, excavate foundation holes and bores.
Excavator	153	1	5	1	10	Trenching.
Cat Skid Steer	73	1	4	1	10	Move excavated soil on site.
2,000-gallon Water Truck	210	1	1	3	10	Dust control.
Pad Construction						
Concrete Truck	450	1	1	19	19	Pour concrete.

Table 14: Summary of Construction Activities

Equipment Type	Specification (BHP)	No. Per Site	Hours Per Day	Trips To/ From Site	Days on Site ¹	Usage
Monopole and Equipment Installation						
3-Ton Flatbed Truck	400	1	3	1	2	Haul materials and equipment.
250-Ton Crane	530	1	8	2	4	Monopole/shelter installation, tower assembly.
8,000-Pound Reach Fork	60	1	4	2	5	Access structures, string conductor, modify structure arms, tree trimming/removal, etc.
Portable Generator	84 [7] ²	1	6	1	10	Operate power tools.
1. Maximum six-week total construction duration. 2. Horsepower and usage data referenced from <i>Broadband Technology Opportunities Program Final Environmental Assessment, Los Angeles Regional Interoperable Communications System LTE System</i> (NTIA 2014).						

Table 15: Noise Emission Reference Levels and Usage Factors

Default Equipment Type	LMR Equipment	Impact Device (Yes/No)	Acoustical Use Factor	Spec Lmax @ 50 feet (dBA)	Actual Measured Lmax @ 50 feet (dBA)
Aerial Man-lift	8,000 lb. Reach Fork	No	20	85	75
Concrete Saw	N/A	No	20	90	90
Concrete Mixer Truck	Concrete Truck	No	40	85	79
Crane	35-Ton to 250-Ton Crane	No	16	85	81
Drill Rig with Augers	N/A	No	20	85	84
Dump Truck	Dump Truck	No	40	84	77
Dozer	Cat Skid Steer	No	40	85	82
Excavator	Excavator	No	40	85	81
Generator, Portable	Portable Generator (TBD)	No	50	82	81
Mini Excavator @ 10 feet	Mini Excavator	No	40		99
Pickup Truck	F250 Antenna and Line Truck	No	40	55	75

Table 15: Noise Emission Reference Levels and Usage Factors

Default Equipment Type	LMR Equipment	Impact Device (Yes/No)	Acoustical Use Factor	Spec Lmax @ 50 feet (dBA)	Actual Measured Lmax @ 50 feet (dBA)
	F550 Civil Truck	No	40	55	75
	2,000-gallon Water Truck	No	40	55	75
Water Trailer	N/A	No	50	77	81

Source: FHWA 2006 and Caterpillar 2014.

Construction Noise Estimation

The FHWA RCNM is used to assess potential short-term construction impacts based on the loudest phase of construction (demolition). In estimating noise exposures for construction equipment, it was assumed that attenuation would result from geometric spreading and ground surface absorption. The geometric spreading of sound from a localized source (i.e., a point source) propagates uniformly and outwardly in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Noise attenuation from ground absorption and reflective-wave canceling adds to the attenuation associated with geometric spreading. For acoustically absorptive or soft sites (i.e., those sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground-attenuation value of 1.5 decibels per doubling of distance is normally assumed. When added to the spherical spreading, the excess ground attenuation results in an overall drop-off rate of 7.5 decibels per doubling of distance. Existing or future noise abatement, such as sound walls, was not included.

Construction Vibration Estimation

Ground vibrations from construction activities generally do not cause damage to structures, with the exemption of fragile buildings, but can result in audible and feelable ranges in buildings very close to construction sites. Human annoyance to ground-borne vibration is generally related to root mean square (rms) velocity levels expressed in VdB. However, construction vibration for building damage is generally assessed in terms of peak particle velocity (PPV).

A damage assessment and annoyance assessment were conducted for this project. The FTA guidelines were used for this analysis since local ordinances have not established thresholds for construction vibration.

According to FTA, criteria for general assessments can be used to evaluate potential annoyance or interference with vibration-sensitive activities due to construction vibration; however, in most cases, the primary concern for construction vibration is the potential damage effects to structures. Table 3 summarizes the criteria for the annoyance assessment and Table 4 summarizes the damage criteria.

Table 3: Ground-borne Vibration Criteria for General Assessments

Land Use Category	GBV Impact Levels		
	Frequent Events ¹	Occasional Events ²	Infrequent Events ³
Category 1: Buildings where vibration would interfere with interior operations	65 VdB ⁴	65 VdB ⁴	65 VdB ⁴
Category 2: Residences and buildings where people normally sleep	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use	75 VdB	80 VdB	83 VdB

Notes:

- "Frequent Events" is defined as more than 70 vibration events of the same source per day. Most rapid transit projects fall into this category.
- "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day. Most commuter trunk lines have this many operations.
- "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day. This category includes most commuter rail branch lines.
- This criterion limit is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes. Vibration-sensitive manufacturing or research will require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the HVAC systems and stiffened floors.

Source: FTA, 2006

Table 4: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)	Approximate Lv*
Reinforced-concrete, steel or timber (no plaster)	0.5	102
Engineered concrete and masonry (no plaster)	0.3	98
Non-engineered timber and masonry buildings	0.2	94
Buildings extremely susceptible to vibration damage	0.12	90

*RMS velocity in decibels (VdB) re 1 micro-inch/second
Source: FTA, 2006

FTA's recommended procedure for estimating vibration impact from construction activities is as follows:

Damage Assessment

- Select the equipment and associated vibration source levels at a reference distance of 25 feet from Table 5.

- Make the propagation adjustment according to the following formula (this formula is based on point sources with normal propagation conditions):

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

where: PPV (equip) is the peak particle velocity in in/sec of the equipment adjusted for distance

PPV (ref) is the reference vibration level in in/sec at 25 feet from Table 5

D is the distance from the equipment to the receiver.

- • Apply the vibration damage criteria from Table 4.

Annoyance Assessment

- • If desired for consideration of annoyance or interference with vibration-sensitive activities, estimate the vibration level Lv at any distance D from the following equation and apply the vibration impact criteria in Table 3 for vibration-sensitive sites:

$$Lv(D) = Lv(25 \text{ ft}) - 30\log(D/25)$$

Table 5 summarizes various pieces of construction equipment with the associated vibration source level.

Table 5: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 feet	Approximate Lv* at 25 feet
Pile Driver (Impact)	Upper range	1.518	112
	Typical	0.644	104
Pile Driver (sonic)	Upper range	0.734	105
	Typical	0.170	93
Clam shovel drop (slurry wall)		0.202	94
Hydromill (slurry wall)	In soil	0.008	66
	In rock	0.017	75
Vibratory Roller		0.210	94
Hoe Ram		0.089	87
Large Bulldozer		0.089	87
Caisson Drilling		0.089	87
Loaded Trucks		0.076	86
Jackhammer		0.035	79
Small Bulldozer		0.003	58
*RMS velocity in decibels (VdB) re 1 micro-inch/second			
Source: FTA, 2006			

Long-Term (Operational Impacts)

During operation at each proposed Project site, the HVAC systems would operate 24 hours a day and the emergency generators would operate monthly. Therefore, noise analyses were conducted for the HVAC systems and emergency generators to determine the potential for long-term operational impacts.

Noise levels from other noise sources such as the hum from some pieces of communications equipment, air conditioners (HVAC) for the communications system, and routine facilities maintenance would be similar to those that exist in ambient residential environments. In addition, the communications equipment would be enclosed in equipment shelters which would attenuate at least 10 dBA and reduce the noise below ambient conditions. Therefore, noise from this equipment would not be audible to sensitive receivers and was not evaluated further. Noise from maintenance activities, which would include landscaping maintenance, routine site inspections, and occasional equipment repairs, would not be substantially different from existing levels and would generally occur less than once per week. According to Los Angeles County noise ordinance, maintenance activities are exempt if conducted during daytime hours of 8:00 a.m. and 6:00 p.m. on any day and 9:00 a.m. to 6:00 p.m. on Sundays. Noise generated from maintenance activities would be similar to ambient conditions and would adhere to the local ordinance. Therefore, noise from maintenance activities was not evaluated further. .

The equipment shelters for the HVAC systems would require heating, ventilation, and air conditioning to maintain interior temperature and humidity. Noise from HVAC systems depends on cooling load, electrical power use, and ambient temperature. It was assumed for this Project that the air conditioning requirement for the shelter is approximately 1.5 tons. According to the Air Conditioning, Heating, and Refrigeration Institute (AHRI) standard 270, the typical noise ratings for refrigeration units with 1.5 tons of capacity range between 63 dBA and 67 dBA. As a worst case scenario, this analysis assumed that the noise emissions from the shelters would be 67 dBA and that the air conditioning units would be on the ground approximately 10 feet from a reflective surface.

Emergency diesel generators (35-kilowatt [kW] to 100-kW) would operate intermittently, for backup power purposes, at the proposed Project sites. Emergency generators would be housed in an enclosed shelter with automatic transfer switches to accommodate remote monitoring of the system and automatic transfer of power in the event of a power outage. Diesel fuel for the generators would be stored in internal 500- to 1,500-gallon, double-walled, steel/belly tanks. In the event of a power outage, these tanks would provide up to 168 hours of site operation at full rated load at most sites and 336 hours of operation at remote sites on mountaintops and Santa Catalina Island.

Operating Noise Estimation

This analysis assumed the air conditioners would operate 24 hours a day and therefore was calculated as community noise equivalent level (CNEL). The basic conversion from L_{eq} to CNEL is as shown in Figure 1:

Figure 2: Conversion from L_{eq} to CNEL

$$CNEL = 10 \log_{10} \left[(1/24) \sum_{i=1}^{24} 10^{[L_{eq}(h)_i + W_i]/10} \right]$$

where

CNEL = 24-hour average L_{eq} with a 4.77-dBA penalty and 10-dBA penalty added during evening hours (7 p.m. to 10 p.m.) and night hours (10 p.m. to 7 a.m.)

$L_{eq}(h)_i$ = L_{eq} for the i th hour

W_i = 0 dBA for day hours (7 a.m. to 7 p.m.)

W_i = $10 \log_{10}(3) = 4.77$ dBA for evening hours (7 p.m. to 10 p.m.)

W_i = 10 dBA for night hours (10 p.m. to 7 a.m.)

\log_{10} = Logarithm to the base 10

The Air-Conditioning & Refrigeration Institute (ARI's) application of sound rating levels of outdoor unitary equipment was used to calculate noise exposure resulting from air conditioner operation (ARI 1997). This method calculates noise attenuation with distance and takes into account noise losses from interaction with surrounding structures.

References for this Appendix

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APPENDIX B-4

CULTURAL RESOURCES INFORMATION

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Table B-4-1: Archaeological Sites within Each Land Mobile Radio Project Site

Site ID	Site Name	Site Primary Number/Trinomial ⁷
AGH	Agoura Hills	P-19-000724 (CA-LAN-724), P-19-000725 (CA-LAN-725), P-19-000846 (CA-LAN-846)
AJT	AeroJet	None
ASD	Auto Square Drive	None
BJM	Black Jack Peak	P-19-003524 (CA-LAN-3524)
BUR	Burnt Peak	None
BUR1	Burnt Peak - 1	None
BUR2	Burnt Peak - 2	None
BUR3	Burnt Peak - 3	None
CPK	Castro Peak	None
DPK	Dakin Peak	P-19-003522 (CA-LAN-3522H), P-19-100568
ENC1	Encinal 1 (Fire Camp 13)	P-19-001326 (CA-LAN-1326), P-19-001327 (CA-LAN-1327), P-19-001328 (CA-LAN-1328)
ENT	Entrada Tank Site	P-19-000423 (CA-LAN-423), P-19-000424 (CA-LAN-424), P-19-001013 (CA-LAN-1013)
FRP	Frost Peak (Upper Blue Ridge)	P-19-003600
FTP	Flint Peak	None
GMT	Grass Mountain	None
GRM	Green Mountain	None
H-17A	H-17A	None
H-69B	H-69B	P-19-000016 (CA-LAN-16)

⁷ Source: California Historical Resources Information System, South Central Coastal Information Center, California State University, Fullerton

Table B-4-1: Archaeological Sites within Each Land Mobile Radio Project Site

Site ID	Site Name	Site Primary Number/Trinomial ⁷
JOP	Josephine Peak	None
JPK	Johnstone Peak - 1	FS-05015200153-PRE
JPK2	Johnstone Peak - 2	FS-05015200153-PRE
LACF072	County FS 72	None
LACFCP08	Camp 8	None
LACFCP09	County CP 9	None
LACFCP11	County CP 11	None
LARICSHQ	LA RICS Headquarters	None
LEPS	Lower Encinal Pump Station	P-19-000028 (CA-LAN-28), P-19-000029 (CA-LAN-29), P-19-000718 (CA-LAN-718), P-19-002833 (CA-LAN-2833)
LPC	Loop Canyon	P-19-002110 (CA-LAN-2110H)
MMC	Mount McDill	P-19-001954 (CA-LAN-1954)
MML	Magic Mountain Link	P-19-002124 (CA-LAN-2124)
MTL2	Mount Lukens-2	None
OAT	Oat Mountain-1	None
PASPD01	Pasadena Police Department	None
PDC	Pacific Design Center	None
PHN	Puente Hills	None
PMT	Pine Mountain	None

Table B-4-1: Archaeological Sites within Each Land Mobile Radio Project Site

Site ID	Site Name	Site Primary Number/Trinomial ⁷
PWT	Portshead Tank	P-19-000458 (CA-LAN-458), P-19-001734 (CA-LAN-1734), P-19-002048 (CA-LAN-2048), P-19-002158 (CA-LAN-2158H), P-19-002172 (CA-LAN-2172), P-19-002812 (CA-LAN-2812), P-19-100040, P-19-100106
RIH	Rio Hondo	None
SDW	San Dimas	None
SGH	Signal Hill	P-19-000837 (CA-LAN-837)
SIM	Simpsons' Building	None
SPN	Saddle Peak	P-19-004322
SUN	Sunset Ridge	None
SUN2	Sunset Ridge-2	None
TMT	Table Mountain	None
TOP	Topanga Peak	None
TPK	Tejon Peak	None
TWR	Tower Peak	None
VPK	Verdugo Peak-2	None
WAD	Walker Drive	None
WMP	Whittaker Middle Peak	None
WS1	100 Wilshire	P-19-002392 (CA-LAN-2392H)
WTR	Whittaker Ridge	P-19-188474
ZHQ	Zuma Life Guard HQ	P-19-000200 (CA-LAN-200), P-19-00021 (CA-LAN-201), P-19-002813 (CA-LAN-2813), P-19-002814 (CA-LAN-2814), P-19-002829 (CA-LAN-2829)

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
ASD	Auto Square Drive	N	CHRIS and OHP Records	N/A	P-19-188840	SCE Tower Cerritos Auto Square	10903 Auto Square Dr, Cerritos, CA (7038-012-800)	N/A	N/A
BUR	Burnt Peak	N	CHRIS and OHP Records	N/A	P-19-186908	Liebre Mountain, Sawmill Mountain Maxwell Road Complex	Forest Roads	N/A	N/A
BUR	Burnt Peak	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
BUR1	Burnt Peak - 1	N	CHRIS and OHP Records	N/A	P-19-186908	Liebre Mountain, Sawmill Mountain Maxwell Road Complex	Forest Roads	N/A	N/A
BUR1	Burnt Peak - 1	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
BUR2	Burnt Peak - 2	N	CHRIS and OHP Records	N/A	P-19-186908	Liebre Mountain, Sawmill Mountain Maxwell Road Complex	Forest Roads	N/A	N/A
BUR2	Burnt Peak - 2	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
BUR3	Burnt Peak - 3	N	CHRIS and OHP Records	N/A	P-19-186908	Liebre Mountain, Sawmill Mountain Maxwell Road Complex	Forest Roads	N/A	N/A
BUR3	Burnt Peak - 3	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
FRP	Frost Peak (Upper Blue Ridge)	N	CHRIS and OHP Records	N/A	P-19-001699	Blue Ridge Lookout Complex	Valyermo Ranger District Angeles National Forest, CA	N/A	N/A
FRP	Frost Peak (Upper Blue Ridge)	N	CHRIS and OHP Records	N/A	P-19-002465	California Riding and Hiking Trail	Valyermo Ranger District Angeles National Forest, CA	N/A	N/A
FRP	Frost Peak (Upper Blue Ridge)	N	CHRIS and OHP Records	N/A	P-19-002478	East Blue Ridge Prairie Fork Road	Valyermo Ranger District Angeles National Forest, CA	N/A	N/A
FRP	Frost Peak (Upper Blue Ridge)	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
GMT	Grass Mountain	N	CHRIS and OHP Records	N/A	P-19-002745	Grass Mountain Lookout	Forest Service lookout on top of Grass Mountain, CA	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
GMT	Grass Mountain	N	CHRIS and OHP Records	N/A	P-19-186910	Grass Mtn-Tule Ridge Rd	Santa Clara-Mojave Rivers Ranger District Angeles National Forest, CA	N/A	N/A
GMT	Grass Mountain	N	CHRIS and OHP Records	N/A	P-19-186911	South Portal Canyon Rd, Forest Rd 7N02	Santa Clara-Mojave Rivers Ranger District Angeles National Forest, CA	N/A	N/A
GMT	Grass Mountain	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
JOP	Josephine Peak	N	CHRIS and OHP Records	N/A	P-19-002248	Josephine Peak Lookout	Angeles National Forest, CA	N/A	N/A
JOP	Josephine Peak	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
JPK	Johnstone Peak	N	CHRIS and OHP Records	N/A	P-19-187815	Sycamore Flat Motorway (1N15)	Angeles National Forest, CA	N/A	N/A
JPK	Johnstone Peak	Y	CHRIS and OHP Records	N/A	P-19-187829	San Dimas Experimental Forest Historic District	Angeles National Forest, CA	Eligible	N/A



Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
JPK	Johnstone Peak	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
JPK2	Johnstone Peak	N	CHRIS and OHP Records	N/A	P-19-187815	Sycamore Flat Motorway (1N15)	Angeles National Forest, CA	N/A	N/A
JPK2	Johnstone Peak	Y	CHRIS and OHP Records	N/A	P-19-187829	San Dimas Experimental Forest Historic District	Angeles National Forest, CA	Eligible	N/A
JPK2	Johnstone Peak	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
LACFCP09	County CP 9	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
LACFCP09	County CP 9	Y	Forest Service Records	N/A	FS-05015500237	Los Pinetos Nike Missile Site	Angeles National Forest	Eligible	N/A
LACFCP11	County CP 11	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
LPC	Loop Canyon	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
LPC	Loop Canyon	Y	Forest Service Records	N/A	FS-05015500237-HIS	Los Pinetos Nike Missile Site	Angeles National Forest	Eligible	N/A
MML	Magic Mountain Link	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
MML	Magic Mountain Link	N	CHRIS and OHP Records	N/A	P-19-186921	Santa Clara Divide Road	Angeles National Forest	N/A	N/A
MML	Magic Mountain Link	N	Forest Service Records	N/A	FS-05015500238	LA-98 Magic Mountain Nike Missile Site,	Angeles National Forest	N/A	N/A
MTL2	Mount Lukens-2	N	CHRIS and OHP Records	N/A	P-19-186923	Lukens-Clear Creek Rd Complex	Forest Roads 2N76, 2N80, 2N79.1, 2N77, and 2N74	N/A	N/A
MTL2	Mount Lukens-2	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030602	P-19-179908	Martha Block Building	29-33 N Fair Oaks, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030603	P-19-179909	Old City Hall	45 N Fair Oaks, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030620	P-19-179925	22 Mills Pl	22 Mills Pl, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030621	P-19-179926	30 Mills Pl	30 Mills Pl, Pasadena, CA	Eligible	2D3
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030622	P-19-179927	32-40 Mills Pl	32-40 Mills Pl, Pasadena, CA	Eligible	2D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030623	P-19-179928	19, 21-25 S Fair Oaks	19, 21-25 S Fair Oaks, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030634	P-19-179939	16-20 N Fair Oaks	16-20 N Fair Oaks, Pasadena, CA	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030635	P-19-179940	The Wizards Three	72 N Fair Oaks, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030638	P-19-179943	The Holly Hotel	100 N Fair Oaks; 2-20 Holly St, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030662	P-19-179966	Marine Hotel	126-128 N Fair Oaks Ave, Pasadena, CA (5723-021-011)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030663	P-19-179967	Marine Hotel	118-128 N Fair Oaks, Pasadena, CA	Eligible	2D3
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030664	P-19-179979	Green Hotel Annex/Castle Green Apartments/Hotel Green W Annex	99 S Raymond Ave; 50 E Green St; 80-82 S Raymond Ave, Pasadena, CA	Listed	2D3
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030686	P-19-179990	Datsun Toyota Automotive	101 S Fair Oaks Ave, Pasadena, CA	Eligible	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030688	P-19-179992	Star Saddle Livery/Royal Land Paper Co	155 S Fair Oaks, Pasadena, CA	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030702	P-19-180006	Friendship Baptist Church	80 W Dayton St, Pasadena, CA	Eligible	7L
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030714	P-19-180018	Smith House	164 Chestnut, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030715	P-19-180019	San Pasqual Convent	140 Chestnut, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030736	P-19-180039	Security Building	230 E Colorado Road, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030737	P-19-180040	Citizens Savings Bank	225 E Colorado Blvd, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030738	P-19-180041	231-243 E Colorado Blvd	231-243 E Colorado Blvd, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030742	P-19-180045	Civic Center Financial District	E Colorado Blvd & Marengo Ave, Pasadena, CA	Listed	1S

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030748	P-19-180049	Colonial Court	291 N Garfield Ave, Pasadena, CA 91101	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030753	P-19-180054	Holly St Livery Stable	110 E Holly St, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030796	P-19-180091	P C Casterline House	406 N Raymond, Pasadena, CA (5725-016-019)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030797	P-19-180092	Peters House	436 N Raymond, Pasadena, CA (5725-016-022)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030799	P-19-180094	Dr W D Turner House	460 N Raymond, Pasadena, CA (5725-016-024)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030800	P-19-180095	S S Sherwood House	464 N Raymond, Pasadena, CA (5725-016-029)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030802	P-19-180097	Meeker House	397 N Raymond, Pasadena, CA	Eligible	3D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030303	P-19-180098	Jane E Meeker House	407-409 N Raymond, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030804	P-19-180099	J E Meeker House	419 N Raymond, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030805	P-19-180100	Charles Prisk House	435 N Raymond, Pasadena, CA (5725-003-030)	Not eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030806	P-19-180101	447 N Raymond	447 N Raymond, Pasadena, CA (5725-016-022)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030807	P-19-180102	Villa Raymond	Villa Raymond 455 N Raymond, Pasadena, CA (5725-003-028)	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030808	P-19-180103	Holy Assembly Church	485 N Raymond, Pasadena, CA (5725-006-023)	Eligible	3B
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030824	P-19-180119	396 N Summit	396 N Summit, Pasadena, CA (5725-023-037)	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030825	P-19-180120	406-408 N Summit	406-408 N Summit, Pasadena, CA (5725-023-036)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030826	P-19-180121	414-416 N Summit	414-416 N Summit, Pasadena, CA (5725-023-035)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030827	P-19-180122	422 N Summit	422 N Summit, Pasadena, CA (5725-023-034)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030829	P-19-180124	442 N Summit	442 N Summit, Pasadena, CA (5725-023-024)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030830	P-19-180125	448 N Summit	448 N Summit, Pasadena, CA (5725-023-023)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030831	P-19-180126	456 N Summit	456 N Summit, Pasadena, CA (5725-023-022)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030832	P-19-180127	464 N Summit	464 N Summit, Pasadena, CA (5725-023-021)	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030833	P-19-180128	Swedish Methodist Evangelical Church	474 N Summit Ave; 478 Summit Ave, Pasadena, CA (5725-023-020)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030834	P-19-180129	490 N Summit	490 N Summit, Pasadena, CA (5725-015-031)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030835	P-19-180130	397 N Summit	397 N Summit, Pasadena, CA (5725-016-034)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030836	P-19-180131	431 N Summit	431 N Summit, Pasadena, CA (5725-016-028)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030837	P-19-180132	437-439 N Summit	437-439 N Summit, Pasadena, CA (5725-016-027)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030838	P-19-180133	451 N Summit	451 N Summit, Pasadena, CA (5725-016-026)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030839	P-19-180134	455 N Summit	455 N Summit, Pasadena, CA (5725-016-025)	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030840	P-19-180135	465 N Summit	465 N Summit, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030841	P-19-180136	469 N Summit	469 N Summit, Pasadena, CA (5725-016-033)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030842	P-19-180137	491 N Summit	491 N Summit, Pasadena, CA (5725-007-021)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	030847	P-19-180142	First Advent Christian Church	394 N Marengo Ave, Pasadena, CA 91101 (5725-027-033)	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031117	P-19-180411	Monticello Manor	221 S Marengo Ave, Pasadena, CA 91101	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031118	P-19-180412	Stoutenburgh House	255 S Marengo Ave, Pasadena, CA	Listed	7K
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031130	P-19-180424	Benshoff House	205 S Oakland Ave, Pasadena, CA 91101	Eligible	3S

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031165	P-19-180459	Post Office	281 E Colorado Blvd, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031166	P-19-180460	YWCA	78 N Marengo Ave, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031171	P-19-180464	Central Library	285 E Walnut St, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031172	P-19-180465	Pasadena City Hall	100 N Garfield Ave, Pasadena, CA 91101	Eligible	3
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031179	P-19-180472	Brookmore Apartments	189 N Marengo Ave, Pasadena, CA 91101	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031180	P-19-180473	Old Fellows Temple	175 N Los Robles Ave, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031182	P-19-180475	Mordisco Drug	240 E Colorado Blvd, Pasadena, CA	Eligible	3D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031183	P-19-180476	Pitzer & Warwick Clothing Store	325 E Colorado Blvd, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031184	P-19-180477	Hutch's Barbeque	390 E Walnut St, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031185	P-19-180478	Brainard Alley	Brainard Alley, Pasadena, CA	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031190	P-19-180483	Las Flores Apartments	130 S Euclid Ave, Pasadena, CA 91101 (5722-030-010)	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031192	P-19-180485	Pinney House	180 S Euclid Ave, Pasadena, CA 91101	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031193	P-19-180486	The Masonic Temple	200 S Euclid Ave, Pasadena, CA	Listed	2S2
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031196	P-19-180489	Livingstone Hotel	131 S Los Robles Ave, Pasadena, CA 91101	Eligible	3S

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031197	P-19-180490	Stanley Apartments	141 S Los Robles Ave, Pasadena, CA 91101 (5722-030-008)	Eligible	3S
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	031203	P-19-180496	F W Woolworth Co	387-399 E Colorado Blvd, Pasadena, CA	N/A	7R
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031204	P-19-180497	Casa Loma Apartments	249 N Euclid Ave, Pasadena, CA 91101	Eligible	3S
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	031207	P-19-180500	221 E Walnut St	221 E Walnut St, Pasadena, CA	N/A	7R
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031228	P-19-180521	Pacific Asia Museum	46 N Los Robles, Pasadena, CA	Listed	1CL
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031229	P-19-180522	Walter W Gerlach Building	464-468 E Colorado Blvd, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031230	P-19-180523	Harry Fitzgerald Building	489 E Colorado Blvd, Pasadena, CA	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031231	P-19-180524	Star News Building	525 E Colorado Blvd, Pasadena, CA	Eligible	2S2
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	031232	P-19-180525	Pasadena Presbyterian Church	585 E. Colorado Blvd, Pasadena, CA	N/A	7N
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031233	P-19-180526	Lloyd's Bank (First Trust Building & Garage)	587-611 E Colorado Blvd; 30-44 N Madison Ave, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031234	P-19-180527	Pasadena Playhouse	39 S El Molino Ave, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031237	P-19-180530	Singer Building	520 E Colorado Blvd, Pasadena, CA	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031255	P-19-180548	Herkimer Arms	527 E Union St, Pasadena, CA 91101	Eligible	7W
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031264	P-19-180557	Edward Blinn House	160 N Oakland Ave, Pasadena, CA	Listed	1D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031272	P-19-180565	Ford Place Historic District	110-175 Oakland Ave; 450-465 Ford Place; 144 N Los Robles Ave, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031277	P-19-180570	Scottish Rite Cathedral	150 N Madison Ave, Pasadena, CA	Eligible	2S2
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031278	P-19-180571	Gartz Court	270 N Madison, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	031286	P-19-180579	Theodore Parker Luken House	267 N El Molino Ave, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	084048	P-19-180706	Pasadena Playhouse Historic District	464-611 E Colorado Blvd; 550-655 E Green St; 21-127 S El Molino Ave; 150 N-101 S Madison Ave, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	031311	P-19-181075	First Congregational Church	464 E Walnut St, Pasadena, CA	N/A	7R

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	070849	P-19-183398	Pasadena Winter Gardens	171 S Arroyo Pkwy, Pasadena, CA	Eligible	3S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	075183	P-19-183600	Pasadena Civic Center District	281 E Colorado Blvd; 28 N Marengo Ave; 95 N Marengo Ave; 125, 129, 131, 135, 137 N Marengo; 75 N Marengo Ave; 235 E Holly St; 285 E Walnut St; 100 N Garfield Ave; 281 Ramona St, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	086881	P-19-184234	N/A	409 N Fair Oaks Blvd, Pasadena, CA	N/A	7R
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	086883	P-19-184235	N/A	418 N Fair Oaks Blvd, Pasadena, CA	N/A	7R
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	086884	P-19-184236	N/A	429 N Fair Oaks, Pasadena, CA	N/A	7R

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	N	CHRIS and OHP Records	086885	P-19-184237	N/A	443 N Fair Oaks, Pasadena, CA	N/A	7R
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	087097	P-19-184416	Ramond-Summit Historic District	N Raymond Ave; E Villa St; Summit Ave; and Maple St, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	087099	P-19-184417	N/A	396 N Raymond, Pasadena, CA (5725-016-035)	Eligible	3D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	087102	P-19-184419	N/A	472 N Raymond, Pasadena, CA (5725-016-030)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	087103	P-19-184420	N/A	450 N Raymond, Pasadena, CA (5725-016-023)	Listed	1D
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	087109	P-19-184423	N/A	397 Townsend Pl, Pasadena, CA (5725-023-037)	Eligible	3D

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	091838	P-19-184771	Old Pasadena Historic District	Roughly bounded by Fair Oaks, Raymond Aves, Arroyo Pkwy, Del Mar Blvd, Corson St, and Green St, Pasadena, CA	Listed	1S
PASPD01	Pasadena Police Dept	Y	CHRIS and OHP Records	097179	P-19-184963	Miss Orton's Classical School for Girls	154 S Euclid Ave, Pasadena, CA	Listed	1D
PHN	Puente Hills	N	CHRIS and OHP Records	N/A	P-19-187967	LA-29 Nike Missile Site	Brea (8269-006-900), (8269-006-901), (8269-006-902), (8269-006-903), (8269-006-002)	N/A	N/A
PMT	Pine Mountain	N	CHRIS and OHP Records	N/A	P-19-002752	Pine Mountain Lookout	N/A	N/A	N/A
PMT	Pine Mountain	N	CHRIS and OHP Records	N/A	P-19-186917	Rincon-Red Box-Sawpit Roads Complex	Forest Road 2N24, 2N30, and 1N36	N/A	N/A
PMT	Pine Mountain	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
PMT	Pine Mountain	N	CHRIS and OHP Records	N/A	P-19-186923	Lukens-Clear Creek Road Complex	Angeles National Forest	N/A	N/A
SGH	Signal Hill	N	CHRIS and OHP Records	029961	P-19-179272	Well “Alamitos 1”	Temple Ave and Hill St, Signal Hill, CA	N/A	7L
SUN	Sunset Ridge	N	CHRIS and OHP Records	N/A	P-19-186918	Sunset Ridge Fire Road	Forest Road 2N07	N/A	N/A
SUN	Sunset Ridge	Y	CHRIS and OHP Records	N/A	P-19-187829	San Dimas Experimental Forest Historic District	Angeles National Forest, CA	Eligible	N/A
SUN	Sunset Ridge	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
SUN-2	Sunset Ridge-2	N	CHRIS and OHP Records	N/A	P-19-186918	Sunset Ridge Fire Road	Forest Road 2N07	N/A	N/A
SUN-2	Sunset Ridge-2	Y	CHRIS and OHP Records	N/A	P-19-187829	San Dimas Experimental Forest Historic District	Angeles National Forest, CA	Eligible	N/A
SUN-2	Sunset Ridge-2	N		N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-150001	Big Pines Park, Zoo/Ski Club Complex	Big Pines Information Center, Angeles National Forest, near Wrightwood, CA	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-150004	Big Pines Park, Camp Marion	Valyermo District, Angeles National Forest	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-150007	McClellan Flat Recreational Residence	N/A	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-150011	Big Pines Park, Camp Kare	N/A	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187984	JPL 24-inch Telescope	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187987	JPL Industrial User's Utility Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187988	JPL Administration Building	24490 Table Mountain Road, Wrightwood	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187989	JPL Garage/Machine Shop	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187990	JPL Laser Remote Sensing (LIDAR) Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187992	JPL Pomona College Observatory	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187993	JPL 0.2-Meter Telescope Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187994	JPL Atmospheric Visibility Monitor	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187995	JPL UC San Diego Observatory	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187996	JPL 1.2-Meter Telescope	24490 Table Mountain Road, Wrightwood	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187997	JPL Remote Sensing Laboratories	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187998	JPL Optical Communications Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-187999	JPL US Forest Service Repeater Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-188000	JPL Table Mountain Facility Water Tank	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-188001	JPL Table Mountain Facility Paint Storage Building	24490 Table Mountain Road, Wrightwood	N/A	N/A
TMT	Table Mountain	Y	CHRIS and OHP Records	N/A	P-19-189777	Big Pines Park Historic District	Valyermo District, Angeles National Forest	Eligible	N/A
TMT	Table Mountain	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WAD	Walker Drive	N	CHRIS and OHP Records	N/A	P-19-190573	Case Study House #21	9038 Wonderland Park Ave, Los Angeles, CA	N/A	N/A
WMP	Whitaker Middle Peak	N	CHRIS and OHP Records	N/A	P-19-002462	Whitaker Peak Lookout	Santa Clara-Mojave Rivers Ranger District, Angeles National Forest	N/A	N/A
WMP	Whitaker Middle Peak; Whitaker Ridge	N	CHRIS and OHP Records	N/A	P-19-003605	Ruby Spur Road 6N53	Santa Clara – Mojave Rivers Ranger District, Angeles National Forest, Ruby Spur Road	N/A	N/A
WMP	Whitaker Middle Peak; Whitaker Ridge	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
WS1	100 Wilshire	Y	CHRIS and OHP Records	028534	P-19-177856	Leo J. Muchenberger House	815 Ocean Ave, Santa Monica, CA	Eligible	3S
WS1	100 Wilshire	Y	CHRIS and OHP Records	028563	P-19-177885	The Jonathan Club	850 Palisades Beach Road, Santa Monica, CA (0406-053-025)	Eligible	2S2

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WS1	100 Wilshire	Y	CHRIS and OHP Records	028568	P-19-177890	Ben Lyons Home	972 Palisades Beach Santa Monica, CA (0406-053-030)	Eligible	2D2
WS1	100 Wilshire	Y	CHRIS and OHP Records	028572	P-19-177894	Bebe Daniels Home	1022 Palisades Beach, Santa Monica, CA (0406-053-034)	Eligible	2D2
WS1	100 Wilshire	N	CHRIS and OHP Records	028579	P-19-177901	1333 Ocean Ave	1333 Ocean Ave, Santa Monica, CA	N/A	5S2
WS1	100 Wilshire	Y	CHRIS and OHP Records	028582	P-19-177904	Palisades Park; Linda Vista Park	100-1500 Blocks of Ocean Ave; Ocean Ave at Wilshire Blvd, Santa Monica, CA (4291- 032-905)	Eligible	7N
WS1	100 Wilshire	N	CHRIS and OHP Records	028583	P-19-177905	Miramar Hotel	101 Wilshire Blvd, Santa Monica, CA	N/A	5S2
WS1	100 Wilshire	N	CHRIS and OHP Records	028587	P-19-177909	1337 Ocean Ave	1337 Ocean Ave, Santa Monica, CA	N/A	5S2
WS1	100 Wilshire	N	CHRIS and OHP Records	028760	P-19-178082	101 Broadway	101 Broadway, Santa Monica	N/A	7R

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WS1	100 Wilshire		CHRIS and OHP Records	028763	P-19-178084	Whitworth Block	131 Broadway, Santa Monica, CA (0406-075-003)	N/A	7R
WS1	100 Wilshire	Y	CHRIS and OHP Records	028780	P-19-178102	301-315 Wilshire Blvd	301-315 Wilshire Blvd, Santa Monica, CA (4292-020-004)	Eligible	5B
WS1	100 Wilshire	Y	CHRIS and OHP Records	028783	P-19-178105	507-517 Wilshire Blvd	507-517 Wilshire Blvd, Santa Monica, CA (4292-012-025)	Eligible	5B
WS1	100 Wilshire	Y	CHRIS and OHP Records	028784	P-19-178106	518-522 Wilshire Blvd	518-520 Wilshire Blvd, Santa Monica, CA (4291-005-003)	Eligible	5B
WS1	100 Wilshire	Y	CHRIS and OHP Records	028812	P-19-178134	Professional Building	710 Wilshire Blvd, Santa Monica, CA	Eligible	3S



Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WS1	100 Wilshire	Y	CHRIS and OHP Records	028814	P-19-178135	Downtown Central Business District	2nd Street: 1227, 1248, 1305, 1308, 1318-1322, 1417-1419, 1418-1420, 1440, 1451, 1452, 1524 3rd Street: 1202, 1228, 1229, 1232-1234, 1236-1240, 1237-1239, 1242-1246 4th Street: 1148, 1210, 1231-1235, 1245, 1330, 1424, 1427, 1433-1437, 1441-1443, 1449, Santa Monica, CA	Eligible	5S2
WS1	100 Wilshire	Y	CHRIS and OHP Records	029089	P-19-178410	Keller Block / Hotel Jackson, Clarendon Hotel	227 Broadway St, 1456-1460 3rd St, 1456 Santa Monica Mall, Santa Monica, CA	Eligible	3S

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WS1	100 Wilshire	Y	CHRIS and OHP Records	094106	P-19-180743	Charmont Apartments	330 California Ave, Santa Monica, CA	Listed	3B
WS1	100 Wilshire	Y	CHRIS and OHP Records	097289	P-19-187152	Sovereign Hotel	205 Washington Ave, Santa Monica, CA (4292-023-010)	Listed	1S
WS1	100 Wilshire	Y	CHRIS and OHP Records	118784	P-19-188012	California Ave Incline	Santa Monica, CA	Eligible	2D2
WS1	100 Wilshire	Y	CHRIS and OHP Records	118785	P-19-188013	Santa Monica Pier Sign	Santa Monica, CA	Eligible	2D2
WS1	100 Wilshire	N	CHRIS and OHP Records	142275	P-19-188768	3rd St Promenade District	3rd St, Santa Monica, CA	N/A	7R
WS1	100 Wilshire	Y	CHRIS and OHP Records	142408	P-19-189257	JC Penny Building	1202 3rd St Promenade, 1202 Santa Monica Mall, Santa Monica, CA	Eligible	3S
WS1	100 Wilshire	Y	CHRIS and OHP Records	N/A	P-19-189258	Edwin Building	310 Wilshire Blvd, Santa Monica, CA (4291-003-021)	Eligible	N/A

Table B-4-2: Architectural and Engineering Resources within Each Land Mobile Radio Project Site

Site ID	Facility Name	NRHP located within the ½ mile APE? (Y/N)	Source	Reference No.	Primary No.	NRHP Name	NRHP Address	NRHP Listed or Eligible Designation	California Historical Resource Status Code
WS1	100 Wilshire	Y	CHRIS and OHP Records	N/A	P-19-189260	Zucky's	431 Wilshire Blvd, Santa Monica, CA (4292-013-010)	Eligible	N/A
WS1	100 Wilshire	Y	CHRIS and OHP Records	143252	P-19-190579	Santa Monica Main Post Office	1248 5th St, Santa Monica, CA	Eligible	3B
WTR	Whittaker Ridge	N	CHRIS and OHP Records	N/A	P-19-186535	Angeles National Forest	N/A	N/A	N/A
WTR	Whittaker Ridge	N	Forest Service Records	N/A	P-19-003605	Ruby Spur Road 6N53	Santa Clara - Mojave Rivers Ranger District Angeles National Forest, Ruby Spur Rd	N/A	N/A
WTR	Whittaker Ridge	N	Forest Service Records	N/A	FS-05015300318	Whittaker Peak Road	Santa Clara - Mojave Rivers Ranger District Angeles National Forest, Ruby Spur Rd	N/A	N/A

Table B-4-3: Paleontological Sensitivity within Each Land Mobile Radio Project Site⁸

Site ID	Site Name	Paleontology	Paleontological Localities Nearby	Geological Unit
AGH	Agoura Hills	Potential for significant fossil remains.	X	Monterey Formation
AJT	AeroJet	Potential for significant fossil remains.	X	Monterey Formation
ASD	Auto Square Drive	Unlikely to encounter significant fossils in the Quaternary alluvium at the surface; Potential for fossils at depth.	X	Quaternary Alluvium overlying paleontologically sensitive units at depth
BJM	Black Jack Peak	No potential for significant fossil remains.		Miocene Igneous Rocks- Andesite
BUR	Burnt Peak	No potential for significant fossil remains.		Gneiss Complex
BUR1	Burnt Peak – 1	No potential for significant fossil remains.		Gneiss Complex
BUR2	Burnt Peak – 2	No potential for significant fossil remains.		Gneiss Complex
BUR3	Burnt Peak – 3	No potential for significant fossil remains.		Gneiss Complex
CPK	Castro Peak	Potential for significant fossil remains.	X	Topanga Formation
DPK	Dakin Peak	No potential for significant fossil remains.		Quartz Diorite
ENC1	Encinal 1 (Fire Camp 13)	No potential for significant fossil remains.		Igneous Rocks
ENT	Entrada Tank Site	Potential for significant fossil remains.	X	Topanga Formation
FRP	Frost Peak (Upper Blue Ridge)	No potential for significant fossil remains.		Pelona Schist
FTP	Flint Peak	No potential for significant fossil remains.		Siliceous Metamorphic Rocks
GMT	Grass Mountain	No potential for significant fossil remains.		Granitic Rocks

⁸ Source: Natural History Museum of Los Angeles County; Paleo Solutions, Inc. 2015



Table B-4-3: Paleontological Sensitivity within Each Land Mobile Radio Project Site⁸

Site ID	Site Name	Paleontology	Paleontological Localities Nearby	Geological Unit
GRM	Green Mountain	Potential for significant fossil remains.	X	Santa Susana Formation
H-17A	H-17A	Potential for significant fossil remains.	X	Sycamore Canyon Formation
H-69B	H-69B	Potential for significant fossil remains.	X	Topanga Formation
JOP	Josephine Peak	No potential for significant fossil remains.		Gneiss Complex
JPK	Johnstone Peak - 1	No potential for significant fossil remains.		Gneiss Complex
JPK2	Johnstone Peak - 2	No potential for significant fossil remains.		Gneiss Complex
LACF072	County FS 72	No potential for significant fossil remains.		Conejo Volcanics
LACFCP08	Camp 8	Unlikely to encounter significant fossils at the surface in artificial fill; Potential for significant fossil remains in underlying Santa Susana Formation.	X	Artificial Fill overlying Santa Susana Formation
LACFCP09	County CP 9	No potential for significant fossil remains.		Granitic Rocks
LACFCP11	County CP 11	Unlikely to encounter significant fossils in the Quaternary alluvium at the surface; No potential for significant fossil remains in underlying non-sedimentary rocks.		Quaternary Alluvium overlying Non-Sedimentary Rocks
LARICSHQ	LA-RICS Headquarters Building	Potential for significant fossil remains.	X	Fernando Formation
LEPS	Lower Encinal Pump Station	Potential for significant fossil remains.	X	Topanga Formation
LPC	Loop Canyon	No potential for significant fossil remains.		Gneiss Complex
MMC	Mount McDill	No potential for significant fossil remains.		Pelona Schist

Table B-4-3: Paleontological Sensitivity within Each Land Mobile Radio Project Site⁸

Site ID	Site Name	Paleontology	Paleontological Localities Nearby	Geological Unit
MML	Magic Mountain Link	No potential for significant fossil remains.		Gabbro Complex
MTL2	Mount Lukens-2	No potential for significant fossil remains.		Granitic Rocks
OAT	Oat Mountain-1	Potential for significant fossil remains.	X	Monterey Formation
PASPD01	Pasadena Police Department	Potential for significant fossil remains.	X	Quaternary Older Alluvium
PDC	Pacific Design Center	Unlikely to encounter significant fossils in Quaternary alluvium at the surface; Potential for fossils at depth.	X	Quaternary Alluvium overlying paleontologically sensitive units at depth
PHN	Puente Hills	Potential for significant fossil remains.	X	Monterey Formation
PMT	Pine Mountain	No potential for significant fossil remains.		Gneiss Complex
PWT	Portshead Tank	Potential for significant fossil remains.	X	Monterey Formation
RIH	Rio Hondo	Potential for significant fossil remains.	X	Fernando Formation
SDW	San Dimas	Potential for significant fossil remains.	X	Monterey Formation
SGH	Signal Hill	Potential for significant fossil remains.	X	Quaternary Older Alluvium
SIM	Simpsons' Building	Potential for significant fossil remains.	X	Topanga Formation
SPN	Saddle Peak	Potential for significant fossil remains.	X	Topanga Formation
SUN	Sunset Ridge	No potential for significant fossil remains.		Gneiss Complex
SUN2	Sunset Ridge-2	No potential for significant fossil remains.		Gneiss Complex
TMT	Table Mountain	No potential for significant fossil remains.		Gneiss Complex



Table B-4-3: Paleontological Sensitivity within Each Land Mobile Radio Project Site⁸

Site ID	Site Name	Paleontology	Paleontological Localities Nearby	Geological Unit
TOP	Topanga Peak	Potential for significant fossil remains.	X	Sespe Formation
TPK	Tejon Peak	No potential for significant fossil remains.		Granitic Rocks
TWR	Tower Peak	No potential for significant fossil remains.		Blue Schist
VPK	Verdugo Peak-2	No potential for significant fossil remains.		Granitic Rocks
WAD	Walker Drive	No potential for significant fossil remains.		Quartz Diorite
WMP	Whittaker Middle Peak	No potential for significant fossil remains.		Granitic Rocks
WS1	100 Wilshire	Potential for significant fossil remains.	X	Quaternary Older Alluvium
WTR	Whittaker Ridge	No potential for significant fossil remains.		Violin Breccia
ZHQ	Zuma Life Guard HQ	Unlikely to encounter significant fossils in the Quaternary alluvium at the surface; Potential for fossils at depth.	X	Quaternary Alluvium overlying paleontologically sensitive units at depth

Table B4-4: Native American Consultation and Coordination

Native American Tribe, Organization or Individual	Contact Name/Title	Date of Contact	Contact Method	Date of Response	Consultation Notes
Native American Heritage Commission	Dave Singleton, Program Analyst	08/29/14	Letter	09/15/14	No known Native American resources within the Project area Provided list of nine Gabrieliño groups or individuals to contact.
Cahuilla Band of Mission Indians, Anza, California	Luther Salgado, Sr., Chairman	01/30/15	TCNS	02/12/15	The Cahuilla expressed no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.
Colorado River Indian Tribes, Parker, Arizona	Wilene Fisher-Holt, Museum Director	02/06/15	TCNS	No Response	As/TCNS if no response from the Colorado River Indian Tribes within 30 days of TCNS notification, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law. No response from this Tribe as of December 2015.
Chemuevi Tribe, Havasu Lake, California	Ronald Escobar, Secretary/Treasurer	02/06/15	TCNS and Email	No Response	Second contact made by email on 09/21/15 with no response as of December 2015
Eastern Shoshone Tribe, Fort Washakie, Wyoming	Wilfred J. Ferris III, Tribal Historic Preservation Officer	03/27/15	TCNS, Letter,	No Response	Second contact made by email on 09/21/15 Additional information and Tribal review fee



Table B4-4: Native American Consultation and Coordination

Native American Tribe, Organization or Individual	Contact Name/Title	Date of Contact	Contact Method	Date of Response	Consultation Notes
			Email, and eTribe		provided on 11/12/15 Review complete with no properties; however, if cultural materials are discovered during construction notify the Eastern Shoshone Tribal Historic Preservation Office.
Fort Mojave Indian Tribe, Mohave Valley, Arizona	Linda Otero, Cultural Society Director	02/06/15	TCNS and Email	No Response	Second contact made by email on 09/21/15 with no response as of December 2015
Gabrieliño, Kizh Nation, Covina, California	Andrew Salas, Chairperson	06/29/15	Letter and Email	07/15/15	Indicated entire Project area within the Gabrieliño Tribal territory Requested one of the Gabrieliño Tribes experienced and certified Native American monitors to be on site during any and all ground disturbances.
Gabrieliño/Tongva San Gabriel Band of Mission Indians, San Gabriel, California	Anthony Morales, Chairperson	06/29/15	Letter and Email	No Response	No Response as of December 2015
Gabrieliño-Tongva Tribe, Los Angeles, California	Bernie Acuna, Co-Chairman	06/29/15	Letter and Email	No Response	No Response as of December 2015
Gabrieliño-Tongva Tribe, Los Angeles, California	Linda Candelaria, Co-Chairman	06/29/15	Letter and Email	No Response	No Response as of December 2015
Gabrieliño-Tongva Tribe, Los Angeles, California	Conrad Acuna, Tribal Member	06/29/15	Letter and Email	No Response	No Response as of December 2015
Tongva Ancestral Territorial Tribal Nation, Marina Del Ray, California	John Tommy Rosas, Tribal Administrator	06/29/15	Letter and Email	No Response	No Response as of December 2015

Table B4-4: Native American Consultation and Coordination

Native American Tribe, Organization or Individual	Contact Name/Title	Date of Contact	Contact Method	Date of Response	Consultation Notes
Gabrieliño -Tongva Indians of California Tribal Council, Bellflower, California	Robert Dorame, Tribal Chair, Cultural Resources	06/29/15	Letter and Email	No Response	No Response as of December 2015
Gabrieliño/Tongva Nation, Los Angeles, California	Sam Dunlap, Cultural Resources Director	06/29/15	Letter and Email	No Response	No Response as of December 2015
Gabrieliño/Tongva Nation, Los Angeles, California	Sandonne Goad, Chairperson	06/29/15	Letter and Email	No Response	No Response as of December 2015
Los Coyotes Reservation, Warner Springs, California	Shane Chapparosa, Chairman	Multiple	TCNS	Multiple	As/TCNS if no response from Los Coyotes within 30 days of TCNS notification, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law. No response from this Tribe as of December 2015.
Morongo Band of Mission Indians, Banning, California	Franklin A. Dancy, Director of Planning	01/30/15	TCNS	02/04/15	The Morongo Band has no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

Table B4-4: Native American Consultation and Coordination

Native American Tribe, Organization or Individual	Contact Name/Title	Date of Contact	Contact Method	Date of Response	Consultation Notes
Paiuma/Yuima Band of Mission Indians, Pauma Valley, California	Randall Majel, Chairman	01/30/15	TCNS	02/05/15	The Paiuma/Yuima Band has no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.
Ramona Band of Cahuilla Indians, Anza, California	John Gomez, Cultural Resources Coordinator	02/06/15	TCNS and Email	No Response	Second contact made by email on 09/21/15 with no response as of December 2015
San Manuel Band of Mission Indians, Highland, California	Ann Brierty, CRM Specialist	02/06/15	TCNS and Email	No Response	Second contact made by email on 09/21/15 with no response as of December 2015
Santa Ynez Band of Chumash Indians, Santa Ynez, California	Freddie Romero, Cultural Preservation Consultant	Multiple	TCNS	Multiple	The Santa Ynez deferred interest to Tribes local to the Los Angeles County area for all TCNS notifications
Soboba Band of Luiseño Indians, San Jacinto, California	Joseph Ontiveros, Director of Cultural Resources	Multiple	TCNS, Letter, and Email	Multiple	<p>The Soboba deferred interest to Tribes local to the Los Angeles County area for all TCNS notifications</p> <p>Additional information requested and Tribal review fees and data provided in November 2015</p> <p>All project sites for which the Soboba had interest were cleared by December 3, 2015, except three sites, for which monitoring by an archaeologist or Native American Tribe close to the project sites was requested.</p>



Table B4-4: Native American Consultation and Coordination

Native American Tribe, Organization or Individual	Contact Name/Title	Date of Contact	Contact Method	Date of Response	Consultation Notes
Twenty Nine Palms Band of Mission Indians, Coachella, California	Darrell Mike, Chairman	01/30/15	TCNS	03/23/15	The Twenty Nine Palms Band has no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.
Timbisha Shoshone Tribe, Bishop, California	George Gholson, Chairman	02/06/15	TCNS	No Response	As/TCNS if no response from the Timbisha Shoshone within 30 days of TCNS notification, the Tribe has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Tribe in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law. No response from this Tribe as of December 2015.

DRAFT
ENVIRONMENTAL IMPACT REPORT FOR THE
LOS ANGELES REGIONAL INTEROPERABILITY
COMMUNICATIONS SYSTEM (LA-RICS)
LAND MOBILE RADIO (LMR) SYSTEM

APPENDIX C
BEST MANAGEMENT PRACTICES



JANUARY 2016

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Best Management Practices

1. Prior to construction, the Authority will develop and implement or require the system contractor to develop and implement a mitigation monitoring and reporting plan (MMRP) for the LMR project. This BMP would serve to organize environmental compliance requirements identified in BMPs, mitigation measures, permit requirements, real property agreement conditions, and other applicable sources. The MMRP would also contain an organization chart and communication plan for environmental compliance as it relates to the proposed LMR project.
2. Prior to construction, the Authority will develop and implement or require the system contractor to develop and implement a worker environmental awareness program (WEAP) for the LMR project. This BMP would serve to institute and formalize an education program to increase awareness of environmental resources and measures and rules that are in place to help minimize impacts to those resources
3. Follow applicable State and local permitting requirements for construction.
4. Apply water to the construction site two to three times per day if dust emissions become a problem.
5. Enclose or water down exposed dirt storage piles.
6. Minimize the disturbed area and preserve vegetation to the maximum extent possible.
7. Maintain topsoil whenever possible.
8. Phase construction activities, to the extent possible, to reduce disturbed areas and time of exposure.
9. Plan the development to fit the topography, soils, drainage pattern, and natural vegetation of the site.
10. Delineate clearing limits, easements, setbacks, sensitive or critical areas, trees, drainage courses, and buffer zones to prevent excessive or unnecessary disturbances and exposure. Minimize the size of staging areas to the extent practical.
11. Avoid excavation and grading during wet weather.
12. Use berms and drainage ditches to divert runoff around exposed areas. Place diversion ditches across the top of cut slopes.
13. Control stormwater flowing to and through the project site.
14. Protect slopes by using measures such as erosion control blankets, bonded fiber matrices, turf reinforcement mats, silt fences (for moderate slopes), etc.

15. Retain sediment on-site and control dewatering practices by using sediment traps or basins for large areas (> 1 acre) when appropriate.
16. Temporarily protect storm drain inlets until the site is stabilized. Protect drainage courses, creeks, and/or catch basins with fiber rolls, silt fences, sand/gravel bags, and/or temporary drainage swales if on-site sediment control measures are not adequately preventing stormwater runoff.
17. Use appropriate erosion control measures to reduce siltation and runoff of contaminants into wetlands and adjacent ponds, streams, or riparian woodland/scrub.
18. Conduct routine inspections of erosion control measures especially before and immediately after rainstorms, and repair if necessary.
19. Establish stabilized construction entrances/exits (e.g. large crushed rocks, stone pads, steel wash racks, hose-down systems, pads).
20. Limit construction activities, including operation of heavy machinery, to normal business hours as established by applicable local noise ordinances (typically 7am-7pm weekdays, but varies by city).
21. Provide advance notification to surrounding land uses disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period.
22. The use of noise-producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only. No project-related public address or music system shall be audible at any adjacent noise-sensitive receptor.
23. Locate mobile equipment staging, parking, and maintenance areas as far away as practical from noise-sensitive receivers such as schools, hospitals, residential areas, nursing homes, etc.
24. Ensure adequate maintenance of equipment, including proper engine maintenance, use of the manufacturer's standard noise control devices (i.e., mufflers, baffling, and/or engine enclosures), adequate tire inflation, and proper maintenance of pollution control devices.
25. Reduce construction equipment idling to the maximum extent practicable.
26. Implement plans to eliminate and/or minimize oil or fuel spills from construction equipment.
27. Clean up leaks, drips, and other spills immediately to avoid soil or groundwater contamination. Cleanup of a spill on soil would include removing the contaminated soil using the emergency spill cleanup gear. Contaminated soil and disposable gear used to clean up a hazardous materials spill would be properly disposed of following State and Federal hazardous material disposal regulations.
28. Stabilize slopes promptly. Following construction, stabilize all remaining disturbed areas by revegetating with locally acquired sources of native seeds and plants. Plant during the optimum season for the species being planted. Any seeding carried out during the revegetation program is

to be completed with commercially available seeds certified to be free of noxious weed seeds and other invasive species. The target for new plantings is an 80 percent survival rate at the end of 3 years. Control invasive exotic plant species to the maximum extent practical to accomplish the revegetation effort. If the application of a chemical is required to control an invasive exotic plant species, a certified pesticide or herbicide applicator shall apply the chemical per labeled directions and in compliance with all Federal, State, and local laws and regulations.

29. When applicable, adopt measures to minimize traffic impacts during construction such as providing warning signs, limiting the use of public right-of-ways for staging of equipment or materials, using flag persons when needed, and coordinating detours if traffic access points will be obstructed.
30. To the extent possible, adopt other feasible measures under the USEPA Guidance Potential for Reducing Greenhouse Gas Emissions in the Construction Sector.
31. In the event that any prehistoric or historic subsurface cultural resources, as defined by the responsible agency, are discovered during ground disturbing activities, all work within 50 feet of the resources should be halted until a qualified archaeologist has assessed the significance of the find. If any find is determined to be significant, representatives of the federal lead agency, the proponent, and the qualified archaeologist would meet to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report prepared by the qualified archaeologist according to current professional standards.
32. Dispose of all wastes properly. Materials that cannot be reused or recycled must be taken to an appropriate landfill or may require disposal as hazardous waste. Never throw debris into channels, creeks, or into wetland areas. Never store or leave debris in the street or near a creek where it may contact runoff.
33. Establish an inspection and maintenance approach to ensure BMPs are working adequately.

ATTACHMENT B

Puente Hills – PHN District 4

Site ID	Facility Name	Organization	Address Line	City	State	Zip Code	Parcel Owner
PHN	Puente Hills	LA County ISD	Near Vantage Point Dr.	Rowland Heights	CA	91748	County of Los Angeles

Verdugo Peak - VPK District 5

Site ID	Facility Name	Organization	Address Line	City	State	Zip Code	Parcel Owner
VPK	Verdugo Peak (County)	LA County ISD	Verdugo Mountain Way	Glendale	CA	91208	County of Los Angeles

ATTACHMENT C

LMR SITE ACCESS AGREEMENT (DRAFT)

LMR SITE ACCESS AGREEMENT

THIS LMR SITE ACCESS AGREEMENT ("Agreement"), is made and entered into in duplicate original this _____ day of _____, 2016,

BY AND BETWEEN

COUNTY OF LOS ANGELES, a body corporate and politic, hereinafter referred to as "Owner"

AND

THE LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY, a Joint Powers Authority, hereinafter referred to as "LA-RICS Authority."

RECITALS:

WHEREAS, Owner is a member of the LA-RICS Authority, which was established pursuant to a Joint Powers Agreement dated January 2009 ("JPA") for the purpose of coordinating governmental services to establish a wide-area interoperable public safety communications network commonly known as LA-RICS;

WHEREAS, Owner owns certain real property described on Exhibit A attached hereto ("Real Property"); and

WHEREAS, Owner desires to license the use of a portion of the Real Property to the LA-RICS Authority for use as a Land Mobile Radio ("LMR") communication site; and

WHEREAS, the parties hereto acknowledge that: (a) LA-RICS AUTHORITY has retained Motorola Solutions, Inc. ("LMR Vendor") to design, construct, and perform services with respect to a regional interoperable LMR telecommunications system as a part of the LA-RICS; (b) the LA-RICS AUTHORITY has retained Motorola Solutions, Inc. ("LMR Vendor") to design and construct a regional interoperable LMR telecommunications system as a part of the LA-RICS; and (c) any of the LA-RICS Authority member agencies may assume the LA-RICS Authority's rights and obligations under this Agreement and/or may perform services with respect to this LA-RICS; and

WHEREAS, LA-RICS AUTHORITY is willing to accept and exercise the rights granted by this Agreement for use of a LMR site located on the Real Property in accordance with the terms and conditions prescribed herein.

NOW, THEREFORE, in consideration of the foregoing recitals, which are hereby deemed a contractual part hereof, and the mutual promises, covenants, and conditions set forth herein, the parties hereto agree as follows:

1. **LMR SITE**

1.01 Owner hereby licenses to the LA-RICS AUTHORITY and LA-RICS AUTHORITY hereby accepts from Owner on the terms and conditions set forth herein, the use of land within a portion of the Real Property, together with all necessary space and easements for access and utilities to install and operate an unmanned LMR communication facility, consisting of the parcels of land shown on Exhibit A attached hereto and incorporated herein by this reference (the "LMR Site").

1.02 The LA-RICS AUTHORITY acknowledges its personal inspection of the LMR Site and the surrounding area and evaluation of the extent to which the physical condition thereof will affect its operations. The LA-RICS AUTHORITY accepts the LMR Site in its as-is condition with no duty to investigate, and Owner makes no warranty, express or implied, as to the suitability of the LMR Site or the Real Property for the LA-RICS AUTHORITY's use; its physical condition, including the condition and stability of the soils or groundwater on or under any of the Real Property; and the presence of pollutants or contaminants therein.

1.03 LA-RICS AUTHORITY and/or the LMR Vendor may make or construct or cause to be made or constructed additions, alterations, repairs, replacements or other changes to the LMR Site at the LA-RICS AUTHORITY's expense in accordance with all of the terms and conditions of this Agreement.

1.04 LA-RICS AUTHORITY hereby acknowledges the title of the Owner or its successors in the Real Property and covenants and agrees never to assail, contest, or resist said title.

1.05 Ownership of all improvements constructed by the LA-RICS AUTHORITY upon each and every site comprising the LMR Site and all alterations, additions or betterments thereto shall remain with the LA-RICS AUTHORITY or other agencies as may be provided by any applicable LA-RICS grant requirements. The LA-RICS AUTHORITY may remove any of its own improvements to the Real Property at any time during the term of this Agreement, and Owner hereby waives any and all lien rights it may have in relation thereto, statutory or otherwise.

2. **PURPOSE AND USE**

2.01 The sole purpose of this Agreement is to allow the LA-RICS AUTHORITY to use the LMR Site for the installation, operation, maintenance, and repair of a LMR facility. The LA-RICS AUTHORITY (and/or its member agencies, the LMR Vendor and/or other agents): (a) shall have the right to construct, install, repair, remove, replace, maintain, and operate the LA-RICS AUTHORITY's LMR communications system, which typically consists of, without limitation, the infrastructure, shelters, equipment and related improvements listed on Exhibit B (Equipment List) attached hereto and incorporated herein by this reference (such LMR system, and associated infrastructure, shelters, equipment and related improvements, collectively, the "LA-RICS

Facility") and other related materials as may be deemed necessary by the LA-RICS AUTHORITY, and (b) shall be allowed access over, through and across each site comprising the Real Property for ingress to and egress from the applicable LMR Site 24 hours per day, 7 days per week without notice. Each LMR Site shall be used only for the purposes authorized by this Section 2.01, and such other purposes as are directly related thereto, and for no other purposes whatsoever (collectively the "Permitted Activities").

2.02 The LA-RICS AUTHORITY shall ensure that all usage of the LMR Site and/or the Real Property hereunder, including without limitation usage by the LMR Vendor, is in compliance with all terms and conditions of this Agreement.

2.03 Nothing contained in this Agreement shall be deemed or construed in any way to limit the Owner's authority to exercise any right or power concerning the utilization of the Real Property including without limitation the LMR Site; provided, however, that such Owner authority shall not include the exercise of any right or power that would interfere with the LA-RICS Facility.

3. **APPROVALS/DESIGN REVIEW**

The LA-RICS AUTHORITY shall furnish and submit to Owner copies of project plans and specifications (along with any other information reasonably requested by Owner) for the LMR Site at the 50%, 75%, and 100% stages of design development, for Owner's review and approval. LA-RICS AUTHORITY agrees to discuss with Owner the Owner's concerns, if any, regarding the proposed plans and to work in good faith to address such concerns and obtain Owner approval prior to implementation of said plans.

Conceptual site plans for the LMR Site are identified in Exhibit C. Upon the LA-RICS AUTHORITY's and Owner's (or Owner's authorized agent's) approval of the final site plan for the LMR Site, such final site plan will be deemed incorporated herein by reference as an update to Exhibit C. Owner agrees that it will approve or deny approval of all plans and specifications within 10 business days of receipt of said plans and specifications shall be deemed approved. LA-RICS AUTHORITY shall provide Owner with a notice of work commencement and an estimated time of completion for each LMR Site.

Owner and the LA-RICS AUTHORITY acknowledge that the LA-RICS AUTHORITY is a California joint powers authority whose members have specified, pursuant to Section 4.04 of its Joint Powers Agreement and Section 6509 of the California Government Code, that all common powers exercised by the LA-RICS AUTHORITY's Board of Directors shall be exercised in a manner consistent with, and subject to all the restrictions and limitations upon the exercise of such powers, as are applicable to the County of Los Angeles ("County") (i.e., the LA-RICS AUTHORITY has adopted the County's operating mode). Accordingly, Owner and the LA-RICS AUTHORITY agree that the LA-RICS AUTHORITY (i) will comply with County Building

Code requirements and (ii) will seek only those governmental approvals that would normally apply to the County, other than with respect to ministerial permits as described below. Notwithstanding the foregoing, the parties agree that their cooperation in addressing any concerns raised by the Owner is essential to the success of the LA-RICS project and that accordingly all such concerns will be taken into consideration throughout the LMR Site plan approval process, as described in this Section 3 and in Section 8.

Should ministerial permits be required, Owner shall expeditiously process such permits within its jurisdiction. To the extent there may be costs associated with Owner's review, such costs will be waived for LA-RICS AUTHORITY. The LA-RICS AUTHORITY may perform and obtain, at the LA-RICS AUTHORITY's sole cost and expense, soil borings, percolation tests, engineering reports, environmental investigations or other tests or reports on, over, and under each LMR Site to the extent necessary to proceed with design, construction, or for compliance with the California Environmental Quality Act and/or the National Environmental Policy Act, and/or to determine if the LA-RICS AUTHORITY's use of the LMR Site will be compatible with the LA-RICS AUTHORITY's engineering specifications and design and operational requirements. Owner shall work cooperatively and expeditiously with the LA-RICS AUTHORITY to complete review of any project plans and specifications, so as not to delay the design and construction of the LA-RICS Facility.

4. **TERM**

The initial term ("Initial Term") of the Agreement shall commence upon full execution of this Agreement ("Commencement Date") and shall terminate upon written notice of termination (a) by LA-RICS AUTHORITY or (b) by Owner pursuant to Section 28 (Default) hereof.

5. **CONSIDERATION**

The consideration for the use granted herein shall be LA-RICS AUTHORITY's compliance with all of the terms and conditions of this Agreement.

6. **CONDITIONS PRECEDENT TO INSTALLATION OR ALMRRATIONS OF EQUIPMENT**

Owner shall have the opportunity to review and provide input, if any, as to all project plans and specifications for the LA-RICS AUTHORITY's proposed alterations of the equipment comprising the LA-RICS Facility (not including "like-kind" replacements) after LA-RICS AUTHORITY's initial installation of the LA-RICS Facility on the LMR Site. In addition, Owner shall have the right to inspect said equipment and the LMR Site at any time during and after installation upon not less than twenty-four (24) hours prior written notice to the LA-RICS AUTHORITY (except in cases of emergency pursuant to Section 14 hereof (Emergency Access)) and, at LA-RICS AUTHORITY's option, LA-RICS AUTHORITY may chose to have a representative to accompany Owner during

any such inspection of or access to a LMR Site. The LA-RICS AUTHORITY shall not commence installation of equipment or alteration of a LMR Site, or any portion thereof, until the Owner has reviewed and approved the plans and specifications in accordance with all of the terms and conditions of this Agreement, including without limitation Sections 3 and 8 hereof. Owner's review and approval of the plans shall not release the LA-RICS AUTHORITY from the responsibility for, or the correction of, any errors, omissions or other mistakes that may be contained in the plans and specifications. The LA-RICS AUTHORITY shall be responsible for notifying Owner and all other relevant parties immediately upon discovery of such omissions and/or errors. The LA-RICS AUTHORITY shall not cause or permit any change of any equipment installed by the LA-RICS AUTHORITY on a LMR Site including power outputs or changes in the use of frequencies described in Exhibit B hereto (Equipment List), but not including "like-kind" replacements, except after Owner has been provided an opportunity to review and approve, such plans and specifications.

7. INSTALLATION

7.01 LA-RICS AUTHORITY shall install the LA-RICS Facility at its own expense and risk as approved by Owner in accordance with the terms hereof, and such installation shall not cause radio frequency interference with equipment, transmission or reception (operated currently or in the future) by the Owner. LA-RICS AUTHORITY and/or its agent shall install interference protection devices such as isolators, cavities, circulators, or combiners as required or recommended by accepted industry practices. Each component of the LA-RICS Facility shall be clearly identified with LA-RICS AUTHORITY's and, as applicable, member agency and/or LMR Vendor's name, address, telephone number, Federal Communications Commission ("FCC") license and frequencies in use. Such identification shall be attached to each component of the LA-RICS Facility in plain view.

7.02 LA-RICS AUTHORITY agrees that Owner may grant the use of any unused portion of the Real Property to any third party for the purpose of installing communications transmitting equipment, so long as such uses do not conflict or interfere with LA-RICS AUTHORITY's operations as provided for pursuant to this Agreement. Any third party granted rights by the Owner shall be required to comply with all applicable noninterference rules of the FCC.

7.03 Owner reserves the right, at its expense, to install on the Real Property, including without limitation within the LMR Site, its own communications shelter, telecommunication equipment, and appropriate tower space for telecommunications and/or microwave (collectively, the "Owner Facilities") so long as the installation of said Owner Facilities does not interfere with LA-RICS AUTHORITY's operations. LA-RICS AUTHORITY and Owner agree to make commercially reasonable efforts to resolve any radio frequency interference issues with equipment, transmission or reception caused by the installation of the Owner Facilities.

7.04 LA-RICS AUTHORITY accepts the LMR Site in an "as is" condition as of the date of full execution of this Agreement. LA-RICS AUTHORITY shall have the right to finance and construct approved equipment and related improvements on the LMR Site at LA-RICS AUTHORITY' sole cost and expense, except as may be provided otherwise by other agreements. Following the construction and installation of LA-RICS AUTHORITY's infrastructure, shelter, equipment, and related improvements, LA-RICS AUTHORITY may thereafter, at its sole cost and expense, perform construction, maintenance, repairs, additions to, and replacements of its equipment as necessary and appropriate for its ongoing business and has the right to do all work necessary to prepare, modify and maintain the LMR Site to accommodate LA-RICS AUTHORITY's infrastructure, shelter, equipment, and related improvements and as required for LA-RICS AUTHORITY's operations of the LA-RICS Facility at the LMR Site, including any structural upgrades required to accommodate LA-RICS AUTHORITY's infrastructure, shelter, equipment, and related improvements on the LMR Site.

7.05 Upon completion of the installation of the equipment comprising the LA-RICS Facility at the LMR Site, LA-RICS AUTHORITY shall provide Owner with a time of completion notice and as-built drawings of the LA-RICS Facility ("As-Builts"). Such As-Builts shall include the location of any of LA-RICS AUTHORITY shelters, cabinets, grounding rings, cables, and utility lines associated with LA-RICS AUTHORITY use of the LMR Site in CAD and PDF formats. Upon receipt of the As-Builts by Owner, the As-Builts shall be deemed incorporated herein by reference as updates to Exhibit C (Site Plan). In the event that LA-RICS AUTHORITY fails to deliver the As-Builts as required by this section within ten (10) business days of receipt of written notice, Owner may cause such As-Builts to be prepared on behalf of LA-RICS AUTHORITY and Owner shall assess a fee for such As-Builts, the cost of which shall become immediately due and payable to Owner upon invoice accompanied by supporting documentation of such fee. Owner shall be responsible for completion of and costs associated with As-Builts resulting from any modifications required by Owner.

8. ALTERATIONS

LA-RICS AUTHORITY shall make no renovations, alterations or improvements to the LMR Site or the Real Property other than to install, maintain, replace and operate the LA-RICS Facility in accordance with the documentation attached hereto as Exhibits A, B, and C and/or as permitted elsewhere herein, without providing prior written notice to Owner, provided that such renovations, alterations, or improvements shall be consistent with the authorized use set forth in Section 2.02 hereof. Notwithstanding the foregoing, however, it is understood and agreed that LA-RICS AUTHORITY shall have the right to make repairs and replacements of "like-kind" infrastructure, shelters, equipment, and/or related improvements without providing notice to the Owner or that may be required as a result of FCC rules or regulations, after providing notice to the Owner. LA-RICS AUTHORITY agrees: (i) to submit to the Owner, for review and approval, all plans and specifications, working drawings, and other information reasonably required by the Owner covering proposed alterations by LA-RICS AUTHORITY, (ii) to discuss with Owner the Owner's concerns, if any, regarding the

proposed alterations, and (iii) to work in good faith to address such concerns. All work to be done by LA-RICS AUTHORITY shall be performed in accordance with the plans provided to Owner.

9. **MAINTENANCE**

Owner shall be responsible for maintenance of the Real Property, including the LMR Site, and such maintenance responsibility shall include general upkeep, landscaping, lawn-mowing, and related maintenance activities. The LMR Site shall be kept neat and clean by LA-RICS AUTHORITY and ready for normal use by Owner and other users. Should LA-RICS AUTHORITY fail to accomplish this, following 30 days written notice from Owner, Owner may perform the work and LA-RICS AUTHORITY shall pay the cost thereof upon written demand by Owner.

LA-RICS AUTHORITY shall be responsible for the timely repair of all damage to the LMR Site or the Real Property caused by the negligence or willful misconduct of LA-RICS AUTHORITY, its employees, agents or business vendors, including without limitation the LMR Vendor. Should LA-RICS AUTHORITY fail to promptly make such repairs after thirty (30) days written notice from Owner, Owner may have repairs made and LA-RICS AUTHORITY shall pay the cost thereof upon written demand by Owner.

The parties hereby acknowledge that certain of the LMR Sites are managed and controlled by the County of Los Angeles Internal Services Department ("ISD"). ISD will incur operating expenses in association with operating and managing said LMR Sites. LA-RICS AUTHORITY shall be responsible for reimbursing ISD for LA-RICS AUTHORITY's pro-rata share of the operating expenses for those LMR Sites, which shall include only the following operating and maintenance expenses: emergency generator, tower light repair, pest control, weed abatement, permit fees and safety inspection. The foregoing operating expenses will be invoiced by ISD (and ISD shall provide concurrently documentation of the invoiced amounts and LA-RICS AUTHORITY's pro rata share) and paid by LA-RICS AUTHORITY within sixty (60) days of its receipt of such invoice.

10. **CONSTRUCTION STANDARDS**

Installation and maintenance of LA-RICS AUTHORITY's equipment including without limitation the LA-RICS Facility shall be performed in a neat and workmanlike manner and shall at all times comply in all respects to the statutes, laws, ordinances and regulations of any governmental authority having jurisdiction which are applicable to the installation, construction, operation and maintenance of LA-RICS AUTHORITY's equipment, including but not limited to the County of Los Angeles Building Code.

LA-RICS AUTHORITY shall remove any debris to the extent resulting from maintenance, operation and construction on the LMR Site by LA-RICS AUTHORITY, its agents or contractors (including without limitation the LMR Vendor). In the event that LA-RICS AUTHORITY fails to remove such debris from the LMR Site, Owner shall

provide written notice to LA-RICS AUTHORITY and allow LA-RICS AUTHORITY ten (10) business days after receipt of notice to remove such debris. After the expiration of such ten-business day period, Owner shall cause such debris to be removed and invoice LA-RICS AUTHORITY for the cost of said removal.

11. **OTHER OPERATIONAL RESPONSIBILITIES**

11.01 As applicable, LA-RICS AUTHORITY and its LMR Vendor shall:

(a) Comply with and abide by all applicable rules, regulations and directions of Owner.

(b) At all times hold a valid FCC license for the Permitted Activities and comply with all applicable City and County ordinances and all State and Federal laws, and, in the course thereof, obtain and keep in effect all required permits and licenses required to engage in the Permitted Activities on the LMR Site.

(c) Conduct the Permitted Activities in a courteous and non-profane manner, operate without interfering with the use of the Real Property by Owner or the public, except as herein permitted, and remove any agent, invitee or employee who fails to conduct Permitted Activities in the manner heretofore described.

(d) Assume the risk of loss, damage or destruction to the LA-RICS Facility and any and all fixtures and personal property belonging to LA-RICS AUTHORITY that are installed or placed within the LMR Site, unless such loss, damage or destruction was caused by the negligent or willful act or omission of the Owner, its agents, employees or contractors.

12. **RELOCATION**

12.01 Owner shall have the right to request relocation of the LA-RICS Facility or any portion thereof on no more than one occasion during the term hereof to another location on the Real Property ("Alternate Site"), provided:

(a) the Alternate Site: (i) is substantially similar to LA-RICS AUTHORITY's current LMR Site in size, (ii) is compatible with LA-RICS AUTHORITY's use pursuant to Section 2 hereof, and (iii) does not materially interfere with any portion of the LA-RICS Facility or the LA-RICS system or equipment;

(b) Owner shall pay all costs incurred by LA-RICS AUTHORITY for relocation of LA-RICS AUTHORITY's equipment from the LMR Site to the Alternate Site and any improvement of the Alternate Site to make it substantially similar to the LMR Site, including all costs incurred to obtain all of the certificates, permits, and other approvals that may be required by any agency having jurisdiction, including costs required to comply with CEQA and the National Environmental Policy Act (NEPA), as applicable, prior to any activity at an Alternate Site that would constitute a "project" as that term is defined in Title 14, Section 15378 of the California Code of Regulations, as

well as any soil boring tests needed to permit LA-RICS AUTHORITY's use of the Alternate Site;

(c) Owner shall give LA-RICS AUTHORITY at least six (6) months written notice before requiring relocation; and

(d) LA-RICS AUTHORITY's use of the LA-RICS Facility in question will not be materially interrupted and LA-RICS AUTHORITY shall be allowed, if necessary, to place temporary equipment on the Real Property during the relocation.

12.02 LA-RICS AUTHORITY shall have the right to request relocation of the LA-RICS Facility or any portion thereof to an Alternate Site on the Real Property pursuant to LA-RICS AUTHORITY's obligations under the Spectrum Lease Agreement, provided that:

(a) the Alternate Site: (i) is substantially similar to LA-RICS AUTHORITY's current LMR Site in size, (ii) is compatible with LA-RICS AUTHORITY's use pursuant to Section 2 hereof, and (iii) does not materially interfere with any portion of the LA-RICS Facility or the LA-RICS system or equipment;

(b) LA-RICS AUTHORITY shall pay all costs relating to relocation of LA-RICS AUTHORITY's equipment from the LMR Site to the Alternate Site and any improvement of the Alternate Site to make it substantially similar to the LMR Site, including all costs incurred to obtain all of the certificates, permits, and other approvals that may be required by any agency having jurisdiction, including costs required to comply with CEQA and the National Environmental Policy Act (NEPA), as applicable, prior to any activity at an Alternate Site that would constitute a "project" as that term is defined in Title 14, Section 15378 of the California Code of Regulations, as well as any soil boring tests needed to permit LA-RICS AUTHORITY's use of the Alternate Site;

(c) LA-RICS AUTHORITY shall give Owner at least sixty (60) days written notice of the requested relocation; requested relocation shall be subject to prior approval by Owner, such approval not to be unreasonably withheld.

13. **ACCESS TO LMR SITE**

13.01 Owner hereby grants to the LA-RICS AUTHORITY, its member agencies, the LMR Vendor, and other agents a nonexclusive right to use, at its sole risk, during the term and option period of this Agreement, the access which serves the LMR Site ("Access"). The LA-RICS AUTHORITY, on behalf of itself and its member agencies, and the LMR Vendor, acknowledge and accept the present condition of the Access on an "as is" basis. The LA-RICS AUTHORITY shall provide Owner with notice of all of its representatives or agents who are authorized to access the LMR Site pursuant to this Section. LA-RICS AUTHORITY shall document the condition of the Access prior to the execution of this Agreement by means of photographs to be provided at LA-RICS AUTHORITY's cost.

13.02 LA-RICS AUTHORITY acknowledges and agrees that occasions may arise requiring the LA-RICS AUTHORITY to share in the cost of cleaning up of mud-slide debris and repairing the Access to its original accessible condition (as documented pursuant to Section 13.01) after a storm or heavy rainfall. LA-RICS AUTHORITY hereby agrees to pay its reasonable proportionate share of such clean-up repair costs within thirty (30) days of receipt of an invoice from Owner, and acknowledges and agrees that the details of any such clean-up or repair and associated cost may be disclosed to LA-RICS AUTHORITY by Owner upon at least thirty (30) days notice. Notwithstanding the foregoing, the LA-RICS AUTHORITY's financial burden pursuant to this Section shall not exceed five thousand dollars (\$5,000) per incident.

14. **EMERGENCY ACCESS BY OWNER**

The Owner and its authorized agents may access the LMR Site at any time for the purpose of performing maintenance, inspection and/or for making emergency improvements or repairs to the LMR Site or to interrupt or terminate LA-RICS AUTHORITY's transmission(s) from the LMR Site should LA-RICS AUTHORITY be unable or unwilling to respond to Owner's request to take immediate action to correct any deficiency which threatens Owner's operation on the LMR Site, provided that Owner shall endeavor to provide a 24-hour prior notice to LA-RICS AUTHORITY and shall access the LMR Site in the presence, if possible, of an LA-RICS AUTHORITY representative, if provided by LA-RICS AUTHORITY. Notwithstanding the foregoing, Owner shall not be required to provide notice to LA-RICS AUTHORITY prior to entering the LMR Site due to an emergency; provided, however, that under no circumstance shall the Owner access LA-RICS AUTHORITY's equipment cabinets. Owner shall use its best efforts to minimize any inconvenience or disturbance to LA-RICS AUTHORITY when entering the LMR Site. LA-RICS AUTHORITY shall reimburse Owner within thirty (30) days of receipt of Owner's written request for Owner's actual costs to correct any deficiency that is corrected by Owner pursuant to this Section.

15. **RADIO FREQUENCY EMISSIONS/INTERFERENCE**

15.01 **No Interference.** LA-RICS AUTHORITY shall not use the LMR Site in any way which causes radio frequency ("RF") interference in excess of levels permitted by the FCC or otherwise interferes with the use of the Real Property by Owner or Owner's agents, invitees or other licensees or users who may occupy portions of the Real Property at the time this Agreement is entered into. LA-RICS AUTHORITY shall be responsible for electromagnetic compatibility of LA-RICS AUTHORITY's equipment with existing and future equipment at the Real Property. LA-RICS AUTHORITY shall conform to Owner's Internal Services Department Facilities Standard STD-140 Radio Site Management, including without limitation the requirement of submitting radio system installation plans for approval.

15.02 **Interference With Public Safety Systems.** In the event of any interference with Owner's Sheriff or Fire Department, CWIRS, Paramedic or LANet systems, or any future public safety-related systems, which is caused by LA-RICS

AUTHORITY's equipment or operations, LA-RICS AUTHORITY shall be immediately notified by Owner of such interference. Following such notification, the parties will meet promptly to cooperatively discuss and reach agreement on how such interference will be resolved.

15.03 Interference With Non-Public Safety Systems. In the event LA-RICS AUTHORITY's operations or equipment cause interference with non-public safety-related systems of Owner or any other duly authorized occupant of the Real Property, written notice of such interference shall be provided to LA-RICS AUTHORITY and LA-RICS promptly meet with Owner to cooperatively discuss and reach agreement on how such interference will be resolved. Owner agrees that Owner and/or any other occupants of the Real Property who currently have or in the future take possession of the Real Property will be permitted to install only such radio equipment that is of the type and frequency which will not cause measurable interference with the existing equipment of LA-RICS AUTHORITY.

15.04 Interference During Emergency. If any measurable interference caused by LA-RICS AUTHORITY's equipment with Owner's electronic equipment during an emergency incident occurs, the LA-RICS AUTHORITY will immediately cease operation, transmission or further use of LA-RICS AUTHORITY's equipment until such time as the emergency incident or interference has ended but LA-RICS AUTHORITY shall be permitted to power up its equipment for intermittent testing with notice.

15.05 Compliance With Law. LA-RICS AUTHORITY is aware of its obligation to comply with all applicable rules and regulations of the FCC pertaining to RF emissions standards, as well as applicable rules and/or regulations of any other federal or state agency (including without limitation the Occupational Safety and Health Administration ("OSHA") having jurisdiction over the installation, operation, maintenance and/or working conditions involving RF emissions and/or safety and work standards performed on or near communications towers and antenna-licensed premises. LA-RICS AUTHORITY agrees to be solely responsible for compliance with all applicable FCC and other governmental requirements with respect to installation, operation, and maintenance of its own equipment and for repairs to its own equipment at the LMR Site. LA-RICS AUTHORITY will immediately remedy its operations to comply with such applicable laws, rules and regulations as they apply to its operations, individually and in the aggregate, with all applicable FCC and other applicable governmental RF emissions standards, but shall only be liable for any violations of such applicable standards to the extent arising solely from LA-RICS AUTHORITY's equipment alone and not in combination with others. Where LA-RICS AUTHORITY's equipment, in combination with other, exceed or violates such standards, LA-RICS AUTHORITY shall reasonably cooperate with Owner and with other relevant parties to mitigate such violations in a timely manner.

16. **UTILITIES**

LA-RICS AUTHORITY shall, at its sole cost and expense, cause the installation of any utility service line required by or for the conduct of the Permitted Activities, and shall be responsible for the payment of all utilities necessary for the operation of the LA-RICS Facility on the LMR Site. If such installation is not feasible, as determined by Owner, LA-RICS AUTHORITY acknowledges and agrees that LA-RICS AUTHORITY nonetheless shall be responsible for any all costs of utilities used by LA-RICS AUTHORITY, which costs will be invoiced by Owner and paid by LA-RICS AUTHORITY within thirty (30) days of its receipt of such invoice.

17. **HOLD HARMLESS AND INDEMNIFICATION**

LA-RICS AUTHORITY agrees to indemnify, defend, save and hold harmless Owner and its Special Districts, agents, elected and appointed officers, and employees from and against any and all liability, expense (including, without limitation, defense costs and legal fees), and claims for damages of any nature whatsoever, including, without limitation, bodily injury, death, personal injury, or property damage arising from or connected with LA-RICS AUTHORITY's operations or its services hereunder, including, without limitation, any Workers' Compensation suit, liability, or expense, arising from or connected with services performed on behalf of LA-RICS AUTHORITY by any person pursuant to this Agreement including without limitation the LMR Vendor.

Owner agrees to indemnify, defend, save and hold harmless LA-RICS AUTHORITY and its member agencies, agents, elected and appointed officers, employees, and contractors from and against any and all liability, expense (including, without limitation, defense costs and legal fees), and claims for damages of any nature whatsoever, including, without limitation, bodily injury, death, personal injury, or property damage arising from or connected with the negligence or willful misconduct of Owner and/or its agents, elected and appointed officers, employees, and contractors in connection with the performance of Owner's obligations hereunder.

18. **INSURANCE**

18.01 Without limiting LA-RICS AUTHORITY's obligations to Owner, LA-RICS AUTHORITY shall provide and maintain, at its own expense during the term of this Agreement, the following program(s) of insurance covering its operations hereunder. Such insurance shall be provided by insurer(s) satisfactory to the Owner's Risk Manager, and evidence of such programs satisfactory to the Owner Risk Manager, shall be delivered to the CEO, Real Estate Division, on or before the effective date of this Agreement. Such evidence shall specifically identify this Agreement and shall contain express conditions that Owner is to be given written notice at least thirty (30) days in advance of any modification or termination of any provisions of insurance and shall name the Owner as an additional insured (except for the Workers' Compensation Insurance). LA-RICS AUTHORITY may self-insure the insurance required under this Agreement, but LA-RICS AUTHORITY will require its contractors and subcontractors to

provide commercial insurance as required in the Section, and any additional insurance required by LA-RICS AUTHORITY of its contractor/subcontractor, shall name the Owner as an additional insured.

(a) General Liability. A program of insurance which shall be primary to and not contributing with any other insurance maintained by Owner, written on ISO policy form CG 00 01 or its equivalent, and endorsed to name the Owner as an additional insured, and shall include, but not be limited to:

(1) Comprehensive general liability insurance endorsed for Site-operations, products/completed operations, contractual, broad form property damage, and personal injury with a limit of not less than

General Aggregate:	\$2 million
Products/Completed Operations Aggregate:	\$2 million
Personal and Advertising Injury:	\$1 million
Per occurrence	\$1 million

(2) Automobile Liability insurance (written on ISO form CA 00 01 or its equivalent) with a limit of liability of not less than \$1 million for each accident, and providing coverage for all "owned," "hired" and "non-owned" vehicles, or coverage for "any auto," used in LA-RICS AUTHORITY's business operations.

(b) Workers Compensation. A program of workers' compensation insurance in an amount and form to meet all applicable requirements of the labor code of the State of California, and which specifically covers all persons providing services on behalf of LA-RICS AUTHORITY and all risks to such persons under the Agreement.

Each Accident:	\$1 million
Disease - policy limit:	\$1 million
Disease - each employee:	\$1 million

(c) Commercial Property Insurance. Such coverage shall:

- Provide coverage for Owner's property, and any improvements and betterments; This coverage shall be at least as broad as that provided by the Causes-of-Loss Special Form (ISO form CP 10 30), Ordinance or Law Coverage, flood, and Business Interruption equal to two (2) years annual rent;
- Be written for the full replacement cost of the property, with a deductible no greater than \$250,000 or 5% of the property value whichever is less. Insurance proceeds shall be payable to the Owner and LA-RICS AUTHORITY as their

interests may appear and be utilized for repair and restoration of the Premises. Failure to use such insurance proceeds to timely repair and restore the Premises shall constitute a material breach of the Agreement.

(d) **Construction Insurance.** If major construction work is performed by LA-RICS AUTHORITY during the term of this Lease (i.e. demolition of structures, construction of new structures, renovation or retrofit involving structures frame, foundation or supports, or more than 50% of building, etc.) then LA-RICS AUTHORITY or LA-RICS AUTHORITY's contractor shall provide the following insurance. Owner shall determine the coverage limits required on a project by project basis:

- **Builder's Risk Course of Construction Insurance.** Such coverage shall insure against damage from perils covered by the Causes-of-Loss Special Form (ISO form CP 10 30). This insurance shall be endorsed to include earthquake, flood, ordinance or law coverage, coverage for temporary offsite storage, debris removal, pollutant cleanup and removal, testing, preservation of property, excavation costs, landscaping, shrubs and plants, and full collapse coverage during construction, without restricting collapse coverage to specified perils. Such insurance shall be extended to include boiler & machinery coverage for air conditioning, heating and other equipment during testing. This insurance shall be written on a completed-value basis and cover the entire value of the construction project, including Owner furnished materials and equipment, against loss or damage until completion and acceptance by the LA-RICS AUTHORITY and the Owner if required.
- **General Liability Insurance.** Such coverage shall be written on ISO policy form CG 00 01 or its equivalent, naming Owner as an additional insured, with limits of not less than

General Aggregate:	\$50 million
Products/Completed Operations Aggregate:	\$50 million
Personal and Advertising Injury:	\$25 million
Each Occurrence:	\$25 million

The Products/Completed Operations coverage shall continue to be maintained in the amount indicated above for at least two (2) years from the date the Project is completed and accepted by the LA-RICS AUTHORITY and the Owner if required.

- **Automobile Liability.** such coverage shall be written on ISO policy form CA 00 01 or its equivalent with limits of not less than \$5 million for bodily injury and property damage, in combined or equivalent split limits, for each single accident. such insurance shall cover

liability arising out of LA-RICS AUTHORITY's or LA-RICS AUTHORITY's contractor use of autos pursuant to this lease, including owned, leased, hired, and/or non-owned autos, as each may be applicable.

- **Professional Liability.** Such insurance shall cover liability arising from any error, omission, negligent, or wrongful act of the LA-RICS AUTHORITY's contractor and/or licensed professional (i.e. architects, engineers, surveyors, etc.) with limits of not less than \$5 million per claim and \$10 million aggregate. The coverage shall also provide an extended two-year reporting period commencing upon expiration, termination or cancellation of the construction project.
- **Workers Compensation and Employers' Liability Insurance** or qualified self-insurance satisfying statutory requirements. Such coverage shall provide Employers' Liability coverage with limits of not less than \$1 million per accident. Such policy shall be endorsed to waive subrogation against the Owner for injury to the LA-RICS AUTHORITY's or LA-RICS AUTHORITY's contractor employees. If the LA-RICS AUTHORITY's or LA-RICS AUTHORITY's contractor employees will be engaged in maritime employment, the coverage shall provide the benefits required by the U.S. Longshore and Harbor Workers Compensation Act, Jones Act or any other federal law to which the LA-RICS AUTHORITY is subject. If LA-RICS AUTHORITY or LA-RICS AUTHORITY's contractor will provide leased employees, or, is an employee leasing or temporary staffing firm or a professional employer organization (PEO), coverage also shall include an Alternate Employer Endorsement (providing scope of coverage equivalent to ISO policy form WC 00 03 01 A) naming the Owner as the Alternate Employer, and the endorsement form shall be modified to provide that Owner will receive not less than thirty (30) days advance written notice of cancellation of this coverage provision.

18.02 Insurer Financial Ratings. Insurance is to be provided by an insurance company acceptable to Owner with an A.M. Best rating of not less than A:VII, unless otherwise approved by Owner.

18.03 Failure to Maintain Coverage. Failure by LA-RICS AUTHORITY to maintain the required insurance, or to provide evidence of insurance coverage acceptable to Owner, shall constitute a material breach of this Agreement.

18.04 Notification of Incidents. LA-RICS AUTHORITY shall report to Owner any accident or incident relating to activities performed under this Agreement which involves injury or property damage which might reasonably be thought to result in the filing of a

claim or lawsuit against LA-RICS AUTHORITY and/or Owner. Such report shall be made in writing within seventy-two (72) hours of LA-RICS AUTHORITY's knowledge of such occurrence.

18.05 Compensation for Owner Costs. In the event that LA-RICS AUTHORITY fails to comply with any of the indemnification or insurance requirements of this Agreement, and such failure to comply results in any costs to Owner, LA-RICS AUTHORITY shall pay full compensation for all reasonable costs incurred by Owner.

19. **FAILURE TO PROCURE INSURANCE**

19.01 Failure on the part of LA-RICS AUTHORITY to procure or maintain the required program(s) of insurance shall constitute a material breach of contract upon which Owner may immediately terminate this Agreement, or at its discretion, procure or renew such insurance and pay any and all premiums in connection therewith, and all monies so paid by Owner shall be repaid by LA-RICS AUTHORITY to Owner upon demand.

19.02 Use of the LMR Site shall not commence until LA-RICS AUTHORITY has complied with the aforementioned insurance requirements, and shall be suspended during any period that LA-RICS AUTHORITY fails to maintain said insurance policies in full force and effect.

20. **TAXES**

20.01 The interest (as defined in California Revenue and Taxation Code Section 107) in the LMR Site created by this Agreement may be subject to property taxation if created. The party in whom the property interest is vested may be subject to the payment of the property taxes levied on the interest.

20.02 LA-RICS AUTHORITY shall pay before delinquency all lawful taxes, assessments, fees or charges which at any time may be levied by the Federal, State, Owner, City, or any other tax or assessment-levying body upon the LMR Site arising from LA-RICS AUTHORITY' use of the LMR Site.

20.03 If LA-RICS AUTHORITY fails to pay any lawful taxes or assessments upon the LMR Site which LA-RICS AUTHORITY is obligated to pay, LA-RICS AUTHORITY will be in default of this Agreement.

21.04 Owner reserves the right to pay any such tax, assessment, fees or charges, and all monies so paid by Owner shall be repaid by LA-RICS AUTHORITY to Owner upon demand. LA-RICS AUTHORITY and Owner agree that this is a license and not a lease and no real estate interest is being conveyed herein.

21. **NOTICES**

Notices desired or required to be given pursuant to this Agreement or by any law now in effect shall be given by enclosing the same in a sealed envelope, Certified Mail - Return Receipt Requested, addressed to the party for whom intended and depositing such envelope, with postage prepaid, in the U.S. Post Office or any substation thereof, or any public letter box, and any such notice and the envelope containing the same, shall be addressed to LA-RICS AUTHORITY as follows:

LA-RICS AUTHORITY
2525 Corporate Place, Second Floor

Monterey Park, California 91754

ATTN: Executive Director

or such other place as may hereinafter be designated in writing by LA-RICS AUTHORITY.

The notices and the certificate of insurance and envelopes containing the same to the Owner shall be addressed as follows:

County of Los Angeles
Chief Executive Office – Real Estate Division
222 South Hill Street, 3rd Floor
Los Angeles, California 90012

Attn: Property Management

or such other place as may hereinafter be designated in writing by Owner.

Notice shall be effective upon actual receipt or refusal as shown on the receipt obtained pursuant to the foregoing. Notices may also be provided by electronic mail or facsimile transmission, provided that such notices are followed up with a copy sent via US Mail.

22. **LA-RICS FACILITY REMOVAL**

22.01 LA-RICS AUTHORITY shall remove all of its LA-RICS Facility and personal and improvements from the LMR Site and the Real Property and restore the LMR Site to its original condition, reasonable wear and tear and damage or destruction by the acts of God beyond the control of LA-RICS AUTHORITY excepted, on or before the expiration of this Agreement, unless this Agreement is otherwise terminated or cancelled prior to the expiration date provided herein, in which case LA-RICS AUTHORITY shall remove from the LMR Site and the Real Property all of its LA-RICS Facility and personal property and improvements and restore the LMR Site to its original

condition, reasonable wear and tear and damage or destruction by the acts of God beyond the control of LA-RICS AUTHORITY excepted, within ninety (90) days of the cancellation. If weather conditions or lack of access to the LMR Site render the timely removal of LA-RICS AUTHORITY' property impossible, then LA-RICS AUTHORITY shall have thirty (30) days from the earliest date on which access is possible in which to comply with this provision.

22.02 If LA-RICS AUTHORITY does not timely remove all of its LA-RICS Facility, personal property and improvements from the LMR Site and the Real Property within the time provided in this section, Owner may, but shall not be required to, remove the LA-RICS Facility and all personal property and improvements at LA-RICS AUTHORITY's expense. LA-RICS AUTHORITY shall reimburse Owner within thirty (30) days of receipt of an itemized accounting of the cost for such removal of personal property and improvements. Owner shall incur no liability for any damage to the LA-RICS Facility during removal or storage.

23. **INDEPENDENT STATUS**

This Agreement is by and between Owner and LA-RICS AUTHORITY and is not intended and shall not be construed to create the relationship of agent, servant, employee, partnership, joint venture or association as between Owner and LA-RICS AUTHORITY. LA-RICS AUTHORITY understands and agrees to bear the sole responsibility and liability for furnishing Workers' Compensation with respect to services performed on behalf of LA-RICS AUTHORITY pursuant to this Agreement.

24. **AMENDMENT**

Any modification of any of the terms and conditions hereof shall require a written amendment signed by an authorized agent of the LA-RICS AUTHORITY and an authorized agent of Owner.

25. **ASSIGNMENT**

25.01 This Agreement may not be sold, assigned or transferred by LA-RICS AUTHORITY without written consent of Owner, which consent will be at Owner's sole discretion. All assignments will require an Assignment Agreement. No change of stock ownership, partnership interest or control of LA-RICS AUTHORITY or transfer upon partnership or corporate dissolution of LA-RICS AUTHORITY shall constitute an assignment hereunder.

25.02 To effect an assignment or transfer pursuant to this Section 25, LA-RICS AUTHORITY shall first deliver to the Owner:

- (i) A written request for approval;
- (ii) The name, address, and most recent financial statements of the proposed sublicensee, assignee, or other transferee;

- (iii) Proposed unredacted instrument of transfer or assignment or any or all of its rights hereunder; and
- (iv) Any other information reasonably requested by the OWNER.

25.03 Owner shall approve or disapprove a proposed transfer, assignment or sublicense within sixty (60) days after LA-RICS AUTHORITY delivers all such items to the Owner. Owner's failure to respond to any request pursuant to this Section shall be deemed disapproval of said request.

25.04 In the case of an assignment of this Agreement, the proposed instrument shall include a written assumption by the assignee of all obligations of LA-RICS AUTHORITY under the Agreement arising thereafter and assignee shall be liable to perform the full obligations of the LA-RICS AUTHORITY under this Agreement and as a condition to the completion of such transfer must cure, remedy, or correct any event of default existing at the time of such transfer in a manner satisfactory to the Owner.

25.05 In the case of a sublicense, the proposed instrument shall specifically include a provision that the sublicense shall comply with and be subject to all of the terms covenants, and conditions of this Agreement.

25.06 Owner shall have the right to lease or license the use of space on LA-RICS Authority's telecommunications pole to third party(ies), if such telecommunications pole is capable of housing such third party(ies), based on terms mutually agreeable to the LA-RICS Authority. Owner shall submit any proposed lease or license to the LA-RICS Authority for review and approval prior to entering into such lease or license. Such proposed instrument shall specifically include: (a) a provision that the lease or license shall comply with and be subject to all of the terms covenants, and conditions of this Agreement, and (b) a requirement that any third party use of LA-RICS Authority's telecommunications pole shall not interfere with LA-RICS Authority's use of the LA-RICS Facility or its operations. The parties agree that any revenues generated by such third party leases or licenses by Owner shall be retained by Owner, except for a fee in an amount calculated to compensate LA-RICS AUTHORITY for its administrative and other costs associated with approval of the lease or license.

26. **SUBORDINATION AND NON-DISTURBANCE**

Owner shall obtain, not later than fifteen (15) days following the execution of this Agreement, a Non-Disturbance Agreement, as defined below, from its existing mortgagees, ground lessors and master lessors, if any, of the Real Property. At Owner's option, this Agreement shall be subordinate to any future master lease, ground lease, mortgage, deed of trust, or other security interest (a "Mortgage") by Owner which from time to time may encumber all or part of the Real Property; provided, however, as a condition precedent to LA-RICS AUTHORITY being required to subordinate its interest in this Agreement to any future Mortgage covering the Real Property, Owner shall obtain for LA-RICS AUTHORITY's benefit a non-disturbance and attornment

agreement in a form reasonably satisfactory to LA-RICS AUTHORITY and containing at a minimum the terms set forth herein below ("Non-Disturbance Agreement"), and shall recognize LA-RICS AUTHORITY's right to remain in occupancy of and have access to the LMR Site as long as LA-RICS AUTHORITY is not in default of this Agreement beyond applicable notice and cure periods. The Non-Disturbance Agreement shall include the encumbering party's ("Lender's") agreement that, if Lender or its successor in interest or any purchase of Lender's or its successor's interest (a "Purchaser") acquires an ownership interest in the Real Property, Lender or such successor in interest or Purchaser will (a) honor all of the terms of this Agreement, (b) fulfill Owner's obligations under this Agreement, and (c) promptly cure all of the then-existing Owner defaults under this Agreement. Such Non-Disturbance Agreement must be binding on all of Lender's participants in the subject loan (if any) and on all successors and assigns of Lender and/or its participants and on all Purchasers. In return for such Non-Disturbance Agreement, LA-RICS AUTHORITY will execute an agreement for the Lender's benefit in which LA-RICS AUTHORITY: (i) confirms that the Agreement is subordinate to the Mortgage or other real property interest in favor of the Lender, (ii) agrees to attorn to Lender if Lender becomes the owner of the Real Property, and (iii) agrees to accept a cure by Lender of any of Owner's defaults, provided such cure is completed within the deadline applicable to Owner.

27. **CONDEMNATION**

In the event of any condemnation of the Real Property (or any portion thereof), LA-RICS AUTHORITY may terminate this Agreement upon written notice to Owner if such condemnation may reasonably be expected to disrupt LA-RICS AUTHORITY's operations at the LMR Site for more than forty-five (45) days. LA-RICS AUTHORITY may on its own behalf make a claim in any condemnation proceeding involving the LMR Site for losses related to the equipment comprising the applicable LA-RICS Facility, its relocation costs and its damages and losses (but not for the loss of its interest, if any, under this Agreement). Any such notice of termination shall cause this Agreement to expire with the same force and effect as though the date set forth in such notice were the date originally set as the expiration date of this Agreement, and Owner and LA-RICS AUTHORITY shall make an appropriate adjustment, as of such termination date, with respect to payments due to the other, if any, under this Agreement.

28. **DEFAULT**

Except as otherwise provided in this Agreement, in the event of a default hereunder by LA-RICS AUTHORITY, Owner shall provide written notice thereof to LA-RICS AUTHORITY. LA-RICS AUTHORITY shall have sixty (60) days from the date of said notice in which to cure the default, provided that LA-RICS AUTHORITY shall have such extended period beyond sixty (60) days as may be required if the nature of the cure is such that it reasonably requires more than sixty (60) days and LA-RICS AUTHORITY has commenced to cure the default within the 60-day period and has acted with reasonable diligence in commencing and pursuing such cure to completion. Owner may not maintain any action or effect any remedies for default against LA-RICS

AUTHORITY unless and until LA-RICS AUTHORITY has failed to cure a default within the time periods set forth in this section. In the event that LA-RICS AUTHORITY fails to cure a default within sixty (60) days or as otherwise provided in this section, Owner may: (a) cure the default and invoice LA-RICS AUTHORITY for all costs reasonably incurred in effecting such cure, or (b) terminate this Agreement upon written notice to LA-RICS AUTHORITY, take possession of the LMR Site and remove all LA-RICS AUTHORITY's improvements located thereon. In the event of a default hereunder by Owner, LA-RICS AUTHORITY shall provide written notice thereof to Owner. Owner shall have sixty (60) days from the date of said notice in which to cure the default, provided that Owner shall have such extended period beyond sixty (60) days as may be required if the nature of the cure is such that it reasonably requires more than sixty (60) days and Owner has commenced to cure the default within the 60-day period and has acted with reasonable diligence in commencing and pursuing such cure to completion. LA-RICS AUTHORITY may not maintain any action or effect any remedies for default against Owner unless and until Owner has failed to cure a default within the time periods set forth in this section. In the event that Owner fails to cure a default within sixty (60) days or as otherwise provided in this section, LA-RICS AUTHORITY may: (a) cure the default and invoice Owner for all costs reasonably incurred by LA-RICS AUTHORITY in effecting such cure, or (b) terminate this Agreement upon written notice to Owner.

29. **WAIVER**

29.01 Any waiver by either party of the breach of any one or more of the covenants, conditions, terms and agreements herein contained shall not be construed to be a waiver of any other breach of the same or of any other covenant, condition, term or agreement herein contained, nor shall failure on the part of either party to require exact, full and complete compliance with any of the covenants, conditions, terms or agreements herein contained be construed as in any manner changing the terms of this Agreement or stopping either party from enforcing the full provisions thereof.

29.02 No option, right, power, remedy, or privilege of either party shall be construed as being exhausted by the exercise thereof in one or more instances. The rights, powers, options, and remedies given either party by this Agreement shall be cumulative.

30. **HAZARDOUS MATERIALS**

The parties hereto hereby warrant and represent that they shall comply with all applicable Federal, State, and local laws and regulations concerning the use, release, storage and disposal of hazardous substances on the LMR Site and the Real Property. For purposes of this Agreement, the term "hazardous substances" shall be deemed to include hazardous, toxic or radioactive substances, as defined in California Health and Safety Code Section 25316, as amended from time to time, or the same or a related defined term in any successor or companion statutes, and crude oil or byproducts of crude oil other than crude oil which exists on the Real Property as a natural formation,

and those chemicals and substances identified pursuant to Health and Safety Code Section 25249.8., as it may be amended from time to time.

The parties each agree to indemnify and defend the other and the other's agents, officers, employees, and contractors against any and all losses, liabilities, claims and/or costs (including reasonable attorneys' fees and costs) to the extent arising from the indemnifying party's breach of any warranty or agreement contained in this Section.

31. **DAMAGE OR DESTRUCTION**

Either party shall have the right to terminate this Agreement with respect to all or any portion of the LMR Site in the event of one of the following: (a) the applicable Real Property or the LMR Site is damaged by fire or other casualty, incidents of war, earthquake, or other violent action of the elements such that repairs cannot reasonably be expected to be completed within forty-five (45) days following said damage (or Owner in its sole discretion elects not to make such repair); or (b) the applicable Real Property or LMR Site is damaged by fire or other casualty, incidents of war, earthquake, or other violent action of the elements such that such damage may reasonably be expected to disrupt LA-RICS AUTHORITY's operations at such LMR Site for more than forty-five (45) days. Notwithstanding the foregoing, in the event of any of the damage described in this Section, LA-RICS AUTHORITY shall have the right to elect to perform or cause to be performed any of the required repairs to the applicable Real Property or LMR Site should Owner elect not to undertake such repairs. Any notice of termination provided pursuant to this Section shall cause this Agreement to expire with the same force and effect as though the date set forth in such notice were the date originally set as the expiration date of this Agreement, and the parties shall make an appropriate adjustment, as of such termination date, with respect to payments due to the other under this Agreement, if any.

Should any matter or condition beyond the control of the parties, such as war, public emergency, calamity, fire, earthquake, flood or act of God prevent performance of this Agreement by either party, such party shall be relieved of the performance of such obligations during the time period of the event.

LA-RICS AUTHORITY shall be solely responsible for any damage or loss to LA-RICS AUTHORITY's equipment resulting from theft or vandalism or resulting from any other cause, except to the extent caused by Owner's acts or omissions.

32. **AUTHORIZATION WARRANTY**

The parties hereto represent and warrant that the person executing this Agreement for each of them is an authorized agent who has actual authority to bind such party to each and every term, condition, and obligation of this Agreement and that all requirements of such party have been fulfilled to provide such authority.

33. **INDEPENDENT CONTRACTOR STATUS**

This Agreement is not intended, and shall not be construed, to create the relationship of agent, servant, employee, partnership, joint venture, or association between Owner and LA-RICS AUTHORITY. LA-RICS AUTHORITY shall bear the sole responsibility and liability for furnishing Worker's Compensation benefits to any person for injuries from or connected with services performed on behalf of LA-RICS AUTHORITY pursuant to this Agreement as required by law. The foregoing indemnification does not apply to liability caused by the negligence of the Owner.

34. **GOVERNING LAW, JURISDICTION, AND VENUE**

This Agreement shall be governed by, and construed in accordance with the internal laws of the State of California. LA-RICS AUTHORITY agrees and consents to the exclusive jurisdiction of the courts of the State of California for all purposes regarding this Agreement and further agrees and consents that venue of any action brought hereunder shall be exclusively in the County of Los Angeles.

35. **COMPLIANCE WITH APPLICABLE LAW**

In the performance of this Agreement, each party and anyone acting on such party's behalf pursuant to this Agreement shall comply with all applicable Federal, State and local laws, rules, regulations, ordinances, directives, guidelines, policies and procedures (including without limitation the rules and regulations of the FCC, the Federal Aviation Administration ("FAA"), and OSHA, and all provisions required thereby to be included in this Agreement are hereby incorporated herein by reference.

36. **COMPLIANCE WITH CIVIL RIGHTS LAWS, NONDISCRIMINATION AND AFFIRMATIVE ACTION**

36.01 LA-RICS AUTHORITY hereby assures that it will comply with Subchapter VI of the Civil Rights Act of 1964, 42 USC Sections 2000 (e) (1) through 2000 (e) (17), to the end that no person shall, on the grounds of race, creed, color, sex, religion, ancestry, age, condition or physical handicap, marital status, political affiliation, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under this Agreement or under any project, program or activity supported by this Agreement.

36.02 LA-RICS AUTHORITY certifies and agrees that it will deal with its subcontractors, bidders, or vendors without regard to or because of race, color, religion, ancestry, national origin, sex, age, physical or mental disability, marital status, or political affiliation.

36.03 LA-RICS AUTHORITY certifies and agrees that it, its affiliates, subsidiaries, or holding companies shall comply with all applicable Federal and State laws and regulations to the end that no person shall, on the grounds of race, color, religion, ancestry, national origin, sex, age, physical or mental disability, marital status, or political affiliation, be excluded from participation in, be denied the benefits of, or be

otherwise subjected to discrimination under this Agreement or under any project, program, or activity supported by this Agreement.

36.04 If the Owner finds that any of the above provisions of this Section have been violated, such violation shall constitute a material breach of this Agreement upon which the Owner may terminate, or suspend this Agreement.

36.05 While the Owner reserves the right to determine independently that the anti-discrimination provisions of this Agreement have been violated, in addition, a determination by the California Fair Employment Practices Commission, the Federal Equal Employment Opportunity Commission that LA-RICS AUTHORITY has violated Federal or State anti discrimination laws or regulations shall constitute a finding by Owner that LA-RICS AUTHORITY has violated the anti-discrimination provisions of this Agreement.

36.06 In the event LA-RICS AUTHORITY violates the antidiscrimination provisions of the Agreement, the parties agree that it is difficult to ascertain the amount of liquidated damages, and hereby agree that the Owner shall, at its sole option, be entitled to the sum of FIVE HUNDRED DOLLARS (\$500.00) for each such violation pursuant to California Civil Code 1671 as liquidated damages in lieu of terminating or suspending this Agreement.

37. **NON EXCLUSIVITY**

Nothing herein is intended or shall be construed as creating any exclusive arrangement with LA-RICS AUTHORITY. This Agreement shall not restrict the Owner from acquiring similar, equal or like goods and/or services from other entities or sources.

38. **NOTICE OF EMPLOYEES REGARDING THE FEDERAL EARNED INCOME CREDIT**

LA-RICS AUTHORITY shall notify its employees, and shall require each Contractor and Subcontractor to notify its employees, that they may be eligible for the Federal Earned Income Credit under the federal income tax laws. Such notice shall be provided in accordance with the requirements set forth in Internal Revenue Service Notice No. 1015.

39. **PUBLIC RECORDS ACT**

39.01 Any documents submitted by LA-RICS AUTHORITY or its agents including without limitation the LMR Vendor and all information obtained in connection with the Owner's right to inspect the LMR Site or any other rights provided by this Agreement shall become the exclusive property of the Owner. All such documents become a matter of public record and shall be regarded as public records, except as specifically provided by California Government Code Section 6250 et seq. ("Public Records Act") and which are marked "trade secret," "confidential," or "proprietary." The

Owner shall not be in any way liable or responsible for the disclosure of any such records including, without limitation, those so marked, if disclosure is required by law, or by an order issued by a court of competent jurisdiction.

39.02 In the event the Owner is required to defend an action on a Public Records Act request as requested by LA-RICS AUTHORITY for any of the aforementioned documents, information, books, records, and/or contents of a proposed marked "trade secret," "confidential", or "proprietary," LA-RICS AUTHORITY agrees to refund and indemnify the Owner from all costs and expenses, including without limitation reasonable attorney's fees, incurred in such action or liability arising under the Public Records Act within thirty days after LA-RICS AUTHORITY's receipt of Owner's invoice.

39.03 Any documents submitted by Owner or its agents and all information obtained in connection with LA-RICS AUTHORITY's rights provided by this Agreement shall become the exclusive property of LA-RICS AUTHORITY. All such documents become a matter of public record and shall be regarded as public records, except as specifically provided by California Government Code Section 6250 et seq. ("Public Records Act") and which are marked "trade secret," "confidential," or "proprietary." LA-RICS AUTHORITY shall not be in any way liable or responsible for the disclosure of any such records including, without limitation, those so marked, if disclosure is required by law, or by an order issued by a court of competent jurisdiction.

39.04 In the event the LA_RICS AUTHORITY is required to defend an action on a Public Records Act request as requested by the Owner for any of the aforementioned documents, information, books, records, and/or contents Owner agrees to refund and indemnify the LA-RICS AUTHORITY from all costs and expenses, including without limitation reasonable attorney's fees, incurred in such action or liability arising under the Public Records Act within thirty days after Owner's receipt of LA-RICS AUTHORITY's invoice.

40. **OTHER TERMS AND CONDITIONS**

40.01 Advertising Materials and Signs. Except for warning signs required by law, LA-RICS AUTHORITY shall not post signs upon the LMR Site or improvements thereon, or distribute or cause to be distributed any advertising materials unless prior approval therefor is obtained from the Owner.

40.02 Habitation. The LMR Site shall not be used for human habitation.

40.03 Illegal Activities. LA-RICS AUTHORITY shall not knowingly permit any illegal activities to be conducted upon the LMR Site.

40.04 Safety. LA-RICS AUTHORITY shall immediately correct any unsafe condition on the LMR Site, as well as any unsafe practices occurring thereon, to the extent such unsafe condition or practice occurs as a result of LA-RICS AUTHORITY's use of the LMR Site. LA-RICS AUTHORITY shall cooperate fully with Owner in the

investigation of any accidental injury or death occurring on the LMR Site, including a prompt report thereof to the Owner. LA-RICS AUTHORITY shall cooperate and comply fully with Owner, State, municipal, federal or any other regulatory agency having jurisdiction thereover, regarding any safety inspections and certifications of any and all LA-RICS AUTHORITY's structures and enclosures. LA-RICS AUTHORITY, at its expense, may use any and all appropriate means of restricting public access to the LMR Site.

40.05 Sanitation. No offensive matter, refuse, or substance constituting an unnecessary, unreasonable or unlawful fire hazard, or material detrimental to the public health in violation of the law, shall be permitted or remain on the LMR Site and within a distance of fifty (50) feet thereof, and LA-RICS AUTHORITY and Owner shall prevent any accumulation thereof from occurring.

40.06 Security Devices. LA-RICS AUTHORITY, at its own expense, may provide any legal devices or equipment and the installation thereof, designated for the purpose of protecting the LMR Site from theft, burglary or vandalism, provided written approval for installation thereof is first obtained from the Owner. Owner shall be responsible for securing the Real Property to the extent deemed necessary by Owner in its sole discretion.

41. **ACKNOWLEDGMENT OF INELIGIBILITY FOR RELOCATION ASSISTANCE**

LA-RICS AUTHORITY hereby disclaims any status as a "displaced person" as such is defined in Government Code Section 7260 and hereby acknowledges its ineligibility for relocation assistance as provided in Government Code Section 7260 through 7276, inclusive, as interpreted in Title 25, Chapter 6, Section 6034(b) (1) of the California Administrative Code upon the future cancellation or termination of this Agreement.

42. **LA-RICS AUTHORITY'S STAFF AND EMPLOYMENT PRACTICES**

42.01 LA-RICS AUTHORITY shall designate one member of its staff as an Operations Manager with whom the Owner may deal with on a daily basis. Any person selected by LA-RICS AUTHORITY as an Operations Manager shall be fully acquainted with LA-RICS AUTHORITY's operation, familiar with the terms and the conditions prescribed therefore by this Agreement, and authorized to act in the day-to-day operation thereof.

42.02 LA-RICS AUTHORITY shall establish an identification system for each of its personnel assigned to service the LMR Site that clearly indicates the name of the person. The identification system shall be furnished at LA-RICS AUTHORITY expense and may include appropriate uniform attire and name badges as routinely maintained by LA-RICS AUTHORITY.

43. **BANKRUPTCY**

The Owner and LA-RICS AUTHORITY hereby expressly agree and acknowledge that it is the intention of both parties that in the event that during the term of this Agreement LA-RICS AUTHORITY shall become a debtor in any voluntary or involuntary bankruptcy proceeding (a Proceeding) under the United States Bankruptcy Code, 11 U.S.C. 101, et seq. (the Code), this Agreement is and shall be treated as an unexpired lease of nonresidential real property for purposes of Section 365 of the Code, 11 U.S.C. 365 (as may be amended), and, accordingly, shall be subject to the provisions of subsections (d)(3) and (d)(4) of said Section 365 (as may be amended).

44. **SUCCESSORS AND ASSIGNS**

Subject to any provision hereof restricting assignment or subletting by LA-RICS AUTHORITY, this Agreement shall bind the parties, their personal representatives, successors and assigns.

45. **SEVERABILITY**

The invalidity of any provision of this Agreement, as determined by a court of competent jurisdiction shall in no way affect the validity of any other provision hereof.

46. **INTERPRETATION**

Unless the context of this Agreement clearly requires otherwise: (i) the plural and singular numbers shall be deemed to include the other; (ii) the masculine, feminine and neuter genders shall be deemed to include the others; (iii) "or" is not exclusive; and (iv) "includes" and "including" are not limiting.

47. **ENTIRE AGREEMENT**

This Agreement (and the attached exhibits) contains the entire agreement between the parties hereto with respect to the matters set forth herein, and no addition or modification of any terms or provisions shall be effective unless set forth in writing, signed by both Owner and LA-RICS AUTHORITY.

COUNTY-SPECIFIC PROVISIONS:

48. **LOBBYIST**

LA-RICS AUTHORITY and each County lobbyist or County lobbying firm as defined in Los Angeles County Code Section 2.160.010, retained by LA-RICS AUTHORITY, shall fully comply with the County Lobbyist Ordinance, Los Angeles County Code Chapter 2.160. Failure on the part of LA-RICS AUTHORITY or any County lobbyist or County lobbying firm retained by LA-RICS AUTHORITY to fully comply with the County Lobbyist Ordinance shall constitute a material breach of this Agreement, upon which County may immediately terminate or suspend this Agreement.

49. **ENFORCEMENT**

The Owner's Chief Executive Officer shall be responsible for the enforcement of this Agreement on behalf of Owner and shall be assisted therein by those officers, employees, or committees of Owner having duties in connection with the administration thereof.

50. **SOLICITATION OF CONSIDERATION**

50.01 It is improper for any County officer, employee or agent to solicit consideration, in any form, from a licensee with the implication, suggestion or statement that the licensee's provision of consideration may secure more favorable treatment for the licensee in the award of the license or that the licensee's failure to provide such consideration may negatively affect the County's consideration of the licensee's submission. A licensee shall not offer to or give, either, directly or through an intermediary, consideration, in any form, to a County officer, employee or agent for the purpose of securing favorable treatment with respect to the issuance of a license.

50.02 LA-RICS AUTHORITY shall immediately report any attempt by a County officer, employee or agent to solicit such improper consideration. The report shall be made either to the County manager charged with the supervision of the employee or to the County Auditor-Controller Employee Fraud Hotline at (213) 974-0914 or (800) 544-6861. Failure to report such solicitation may result in the Agreement being terminated.

51. **ACKNOWLEDGEMENT OF COUNTY'S COMMITMENT TO THE SAFELY SURRENDERED BABY LAW**

LA-RICS AUTHORITY acknowledges that the County of Los Angeles places a high priority on the implementation of the Safely Surrendered Baby Law. LA-RICS AUTHORITY understands that it is the County's policy to encourage LA-RICS AUTHORITY to voluntarily post the Owner's "Safely Surrendered Baby Law" poster in a prominent position at the LA-RICS AUTHORITY' place of business. LA-RICS AUTHORITY will also encourage its contractors and subcontractors, if any, to post this poster in a prominent position in the contractor's or subcontractor's place of business. The County's Department of Children and Family Services will supply LA-RICS AUTHORITY with the poster to be used. As of the inception of this Agreement, information on how to receive the poster can be found on the Internet at www.babysafela.org.

52. **WARRANTY OF ADHERENCE TO OWNER'S CHILD SUPPORT COMPLIANCE PROGRAM**

52.01 LA-RICS AUTHORITY acknowledges that the County has established a goal of ensuring that all LA-RICS AUTHORITY's employees are in compliance with their court-ordered child, family and spousal support obligations in order to mitigate the economic burden otherwise imposed upon the County and its taxpayers.

52.02 As required by the County's Child Support Compliance Program (Owner Code Chapter 2.200) and without limiting the LA-RICS AUTHORITY's duty under this Agreement to comply with all applicable provisions of law, the LA-RICS AUTHORITY warrants that it is now in compliance and shall during the term of this Agreement maintain in compliance with employment and wage reporting requirements as required by the Federal Social Security Act (42 USC Section 653a) and California Unemployment Insurance Code Section 1088.5, and shall implement all lawfully served Wage and Earnings Withholding Orders or Child Support Services Department Notices of Wage and Earnings Assignment for Child, Family or Spousal Support, pursuant to Code of Civil Procedure Section 706.031 and Family Code Section 5246(b).

53. **RECYCLED BOND PAPER**

Consistent with the County's Board of Supervisors' policy to reduce the amount of solid waste deposited at County landfills, LA-RICS AUTHORITY agrees to use recycled-content paper to the maximum extent possible on this Agreement and all documents related thereto.

IN WITNESS WHEREOF, the LA-RICS AUTHORITY has executed this Agreement or caused it to be duly executed and Owner has caused this Agreement to be executed on the day, month and year first above written.

THE LOS ANGELES REGIONAL
INTEROPERABLE COMMUNICATIONS
SYSTEM AUTHORITY

COUNTY OF LOS ANGELES

A California Joint Powers Authority

By: _____

By: _____

Print Name: _____

Its: _____

APPROVED AS TO FORM:

APPROVED AS TO FORM:

MARY C. WICKHAM
COUNTY COUNSEL

MARY C. WICKHAM
COUNTY COUNSEL

By: _____
Deputy

By: _____
Deputy

EXHIBIT A

DRAFT

EXHIBIT B
EQUIPMENT LIST

DRAFT

EXHIBIT C
SITE PLAN

DRAFT